332520

Attachment 3 - TSCA

AIR, PESTICIDES, AND TOXICS RECORDS CENTER
Facility Filing Form

CIRCLE ONE: NEW FILE INFILING

CHECK FILE CATEGORY

(X) TSCA PCB

(__) TSCA LEAD

(__) TSCA 5 & 8

(__) TSCA AHERA

(__) TSCA CBI

CHECK EXTENSION (if warranted)

(__) ES - Enforcement Sensitive

(__) DO - Docket Number _____
(Provide Complete Docket Number)

CURRENT FILE NUMBER TXD 000802918

FACILITY NAME British Petroleum (formerly ARCO PERMIAN)

FACILITY PHYSICAL ADDRESS 1501 FM 1601

CRANE, TX 79731-6512

REMARKS _____

REQUESTOR'S NAME & PHONE NUMBER

Lou Roberts x2529 8/13/02

AIR, PESTICIDES, AND TOXICS
Facility Filing Form

CIRCLE ONE: NEW FILE INFILING

CHECK FILE TYPE:

(X) TSCA PCB

(___) TSCA LEAD

(___) TSCA 5 & 8

(___) TSCA AHERA

(___) Other _____

CURRENT FILE NUMBER TX 0002409415

FACILITY NAME ARCO Permian

FACILITY PHYSICAL ADDRESS HC.65 -- BOX 55

Crane, TX 79731

REMARKS _____

REQUESTOR'S NAME & PHONE NUMBER

Tom Roberts 6/25/01

T-8000 2409 415

ARCO Permian
600 N Marienfeld
Midland TX 79701
Post Office Box 1610
Midland TX 79702
Telephone 915 688 5200

August 24, 2000

Ms. Lou Roberts
EPA Region VI
1445 Ross Ave.
Dallas, TX 75202

ARCO Permian
H.C. 45 -- Box 55
Crane, TX 79731
Crane County

CERTIFIED MAIL, Return Receipt Requested

Dear Ms. Roberts:

As we discussed by telephone on July 11, 2000, ARCO Permian, a Business Unit of BP Amoco, has discovered the presence of PCBs at our Block 31 Gasoline and Pressure Maintenance Plant in Crane County, Texas. As required by 40 CFR 761.61(a)(3), this letter provides the 30 day notice for remediation of PCBs. Remediation at this site will include the following:

- Excavating soil that is contaminated at >25 ppm PCBs. Excavated soil will be sent to Waste Control Specialists' hazardous waste landfill in Andrews, Texas. (40 CFR 761.61(a)(5)(i)(B)(2)(iii))
- Using Philip Services to employ their patented process to wash the plant's air system, removing PCBs still contaminating the lines.

The soil was tested for PCBs if it was suspected of contamination due to location and operating practices as remembered by long-time employees. Sample results are shown on the attached table. As required by 40 CFR 761.61(a)(4)(i)(B)(1) defining cleanup level for low occupancy areas, we will remove soil that is above 25 ppm PCBs. Clean-up of the soil will require removal of the surface gravel (which was added in the 1990's) and removal of soil. The estimated area of soil to be removed is 27' by 36', and expected average depth is 3" - 6". We plan to use Dexsil's Chlor-n-Soil test kits, which test positive when the PCB concentration exceeds 50 ppm, to help define the contaminated soil. Laboratory analyses will ultimately be used to show that the soil left in place contains less than 25 ppm PCBs. Work will be performed by ARCO Permian personnel.

The soil excavation will begin as soon as we have EPA approval to begin work. Decontamination of the air system will begin in January, 2001.

A copy of this letter, including the sample collection procedure and laboratory analyses, is located at the Block 31 plant. 40 CFR 761.61(a)(3)(i)(E)

Please call me at (915)688-5703 or Margaret Lowe at (915)688-5799 if you have questions or need additional information.

Sincerely,

Peggy Waisanen

Attachments – Laboratory analyses
Topographic map
Plot plan

cc: Jim Hill- CRB (w/o topo map)
File 41A2d1 (w/o topo map)
Margaret Lowe (w/o topo map)

Sample Results
Block 31 PCB Analyses

Wipe Samples (Air System)

Wipe samples were obtained by wetting gauze with hexane and wiping 100 cm^2 of the line or fitting. Gauze was placed in a glass container and shipped to the lab.

Location	Date Sampled	Date Analyzed	micrograms/cm^2
F112 Inside 4" line	6/28/2000	7/5/2000	14,000
F1119 at RO Bldg	6/28/2000	7/5/2000	2,000
F112 Bottom Flange	6/28/2000	7/5/2000	40,000
K5H Air	6/28/2000	7/5/2000	19,000
K-20 Air Dryers E55 A&B	7/19/2000	7/24/2000	1,490
Downstream of F-64 at letdown	7/19/2000	7/24/2000	298,000
3" line SW of RO Bldg	7/19/2000	7/24/2000	8,000
K25 Air Dryer E50 A&B	7/19/2000	7/24/2000	13,000
Tool Air at Big K-30 Bldg	7/19/2000	7/24/2000	390
1" feeding K10A	7/19/2000	7/24/2000	693,000
K-22 Air Dryers E54 A&B	7/19/2000	7/24/2000	<2
Downstream of F-1119C	7/19/2000	7/24/2000	72,000

Soil Samples

Soil was collected using a shovel and was placed in glass jars for shipping to the laboratory.

Sample Number & location	Date Sampled	Date Analyzed	Depth	mg/kg PCBs
1 Starting Air Bldg 2 drain	6/28/2000	7/5/2000	3"	9
2 Starting Air Bldg West Soil	6/28/2000	7/5/2000	3"	4.4
3 F112 (under bottom flange)	6/28/2000	7/5/2000	3"	<0.1
4 Bldg 2, near K5H	6/28/2000	7/5/2000	3"	0.88
5 K22A	7/19/2000	7/21/2000	3"	0.16
6 F440	7/19/2000	7/21/2000	3"	6.2
7 F112 (N. 12'West)	7/19/2000	7/21/2000	3"	0.41
8 E20	7/19/2000	7/21/2000	3"	2.1
9 F907	7/19/2000	7/21/2000	3"	2.7
10 K22B	7/19/2000	7/21/2000	3"	0.12
11 F 15/22	7/19/2000	7/21/2000	3"	1122
12 N. of RO Bldg	7/19/2000	7/21/2000	3"	26
13 South of F 15/22 sample	8/3/2000	8/11/2000	3"	167
14 South of F 15/22 sample	8/3/2000	8/11/2000	6"	18
15 South of F 15/22 sample	8/3/2000	8/11/2000	12"	4
16 South of F 15/22 sample	8/3/2000	8/11/2000	18"	5
17 South of F 15/22 sample	8/3/2000	8/11/2000	24"	2.55

4/A2 d1

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
ARCO PERMIAN
Attention: Peggy Waisanen
600 N. Marienfeld
Midland, TX 79701

July 7, 2000
Receiving Date: 6/29/00
Sample Type: Soil
Project No: N/A
Project Location: Block 31
Project Name: Block 31

Extraction Date: 06/30/00
Analysis Date: 06/30/00
Sampling Date: 06/28/00
Sample Condition: Intact & Cool
Sample Received by: VH

TA #	FIELD CODE	TOTAL PCBs (mg/kg)
T148965	F112 Bottom Flange	<0.1
T148968	Soil, Bldge 2, K5H	0.88
CV		0.36
REPORTING LIMIT		0.1
RPD		9
Extraction Accuracy		92
Instrument Accuracy		89

PCB SPIKE : 0.125 mg/kg

PCB CV : 0.40 mg/L

PCB Analysis by EPA Method SW 846 8082
CHEMIST: ML

Director, Dr. Blair Leftwich

7-7-00
Date

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
ARCO PERMIAN
Attention: Peggy Waisanen
600 N. Marienfeld
Midland, TX 79701

July 7, 2000
Receiving Date: 6/29/00
Sample Type: Soil
Project No: N/A
Project Location: Block 31
Project Name: Block 31

Extraction Date: 07/5/00
Analysis Date: 07/5/00
Sampling Date: 06/28/00
Sample Condition: Intact & Cool
Sample Received by: VH

TA #	FIELD CODE	TOTAL PCBs (mg/kg)
T148967	Starting Air Bldg 2 Drain	9
T148969	Starting Air Bldg West Soil	4.4*

***Estimated concentration below reporting limit of 10 ppm. Higher reporting limit due to dilution due to matrix interference.**

CV	0.35
REPORTING LIMIT	0.1
RPD	0
Extraction Accuracy	88
Instrument Accuracy	88

PCB SPIKE : 0.125 mg/kg

PCB CV : 0.40 mg/L

PCB Analysis by EPA Method SW 846 8082
CHEMIST: ML

Director, Dr. Blair Leftwich

7-7-00
Date

TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
ARCO PERMIAN
Attention: Peggy Waisanen
600 N. Marienfeld
Midland, TX 79701

July 7, 2000
Receiving Date: 6/29/00
Sample Type: Wipe
Project No: N/A
Project Location: Block 31
Project Name: Block 31

Extraction Date: 07/5/00
Analysis Date: 07/5/00
Sampling Date: 06/28/00
Sample Condition: Intact & Cool
Sample Received by: VH

TA #	FIELD CODE	TOTAL PCBs (mg/100 cm2)
T148962	F112 Inside 4" Line	14
T148963	F1119 at RO Bldg.	2
T148964	F112 Bottom Flange	40
T148966	KSH Air	19
CV		0.35
REPORTING LIMIT		0.002
RPD		0
Extraction Accuracy		88
Instrument Accuracy		88

PCB SPIKE : 0.125 mg/kg

PCB CV : 0.40 mg/L

PCB Analysis by EPA Method SW 846 8082
CHEMIST: ML

Director, Dr. Blair Leftwich

7-7-00
Date

Report Date: July 27, 2000 Order Number: A00072009 Page Number: 2 of 5
N/A Block 31 Block 31

Analytical and Quality Control Report

Sample: 150061 - 1-Wipe K-20 Air Dryers E55 A&B

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03929	Date Analyzed:	7/24/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03402	Date Prepared:	7/24/00

Param	Flag	Result	Units	Dilution	RDL
PCB		1.49	mg/100cm2	1	0.002

Sample: 150062 - 2-Wipe Downstream of F-64 at Letdown

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03929	Date Analyzed:	7/24/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03402	Date Prepared:	7/24/00

Param	Flag	Result	Units	Dilution	RDL
PCB		298	mg/100cm2	1	0.002

Sample: 150063 - 3-Wipe 3" line SW corner of RO Bldg

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03929	Date Analyzed:	7/24/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03402	Date Prepared:	7/24/00

Param	Flag	Result	Units	Dilution	RDL
PCB		8	mg/100cm2	1	0.002

Sample: 150064 - 4-Wipe K 25 Air Dryer E50 A+B

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03929	Date Analyzed:	7/24/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03402	Date Prepared:	7/24/00

Param	Flag	Result	Units	Dilution	RDL
PCB		13	mg/100cm2	1	0.002

Sample: 150065 - 5-Wipe Tool air at Big K-30 Bldg

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03929	Date Analyzed:	7/24/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03402	Date Prepared:	7/24/00

Param	Flag	Result	Units	Dilution	RDL
PCB		0.39	mg/100cm2	1	0.002

Sample: 150066 - 6-Wipe 1" feeding K10 A

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03929	Date Analyzed:	7/24/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03402	Date Prepared:	7/24/00

Report Date: July 27, 2000 Order Number: A00072009 Page Number: 3 of 5
N/A Block 31 Block 31

Param	Flag	Result	Units	Dilution	RDL
PCB		693	mg/100cm2	1	0.002

Sample: 150067 - 7-Wipe K-22 Air Dryers E57 A+B

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03929	Date Analyzed:	7/24/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03402	Date Prepared:	7/24/00

Param	Flag	Result	Units	Dilution	RDL
PCB		<0.002	mg/100cm2	1	0.002

Sample: 150068 - 8-Wipe Downstream of F-1119C

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03929	Date Analyzed:	7/24/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03402	Date Prepared:	7/24/00

Param	Flag	Result	Units	Dilution	RDL
PCB		72	mg/100cm2	1	0.002

Sample: 150069 - K22A

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03845	Date Analyzed:	7/21/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03327	Date Prepared:	7/21/00

Param	Flag	Result	Units	Dilution	RDL
PCB		0.16	mg/Kg	1	0.002

Sample: 150070 - F440

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03845	Date Analyzed:	7/21/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03327	Date Prepared:	7/21/00

Param	Flag	Result	Units	Dilution	RDL
PCB		6.2	mg/Kg	1	0.002

Sample: 150071 - F112 (N.12' West)

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03845	Date Analyzed:	7/21/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03327	Date Prepared:	7/21/00

Param	Flag	Result	Units	Dilution	RDL
PCB		0.41	mg/Kg	1	0.002

Sample: 150072 - E20

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03845	Date Analyzed:	7/21/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03327	Date Prepared:	7/21/00

Report Date: July 27, 2000 Order Number: A00072009 Page Number: 4 of 5
N/A Block 31 Block 31

Param	Flag	Result	Units	Dilution	RDL
PCB		2.1	mg/Kg	1	0.002

Sample: 150073 - F907

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03845	Date Analyzed:	7/21/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03327	Date Prepared:	7/21/00

Param	Flag	Result	Units	Dilution	RDL
PCB		2.7	mg/Kg	1	0.002

Sample: 150074 - K22B

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03845	Date Analyzed:	7/21/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03327	Date Prepared:	7/21/00

Param	Flag	Result	Units	Dilution	RDL
PCB		0.12	mg/Kg	1	0.002

Sample: 150075 - F 15/22

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03845	Date Analyzed:	7/21/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03327	Date Prepared:	7/21/00

Param	Flag	Result	Units	Dilution	RDL
PCB		1122	mg/Kg	1	0.002

Sample: 150076 - N. RO Bldg.

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC03845	Date Analyzed:	7/21/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03327	Date Prepared:	7/21/00

Param	Flag	Result	Units	Dilution	RDL
PCB		26	mg/Kg	1	0.002

Quality Control Report
Continuing Calibration Verification Standards

Sample: CCV (1) QC Batch: QC03845

Param	Flag	Units	CCVs True Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed
PCB		mg/100cm2	0.40	0.39	97	85 - 115	7/21/00

Analytical and Quality Control Report

Sample: 150946 - 3"

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC04265	Date Analyzed:	8/11/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03707	Date Prepared:	8/6/00

Param	Flag	Result	Units	Dilution	RDL
PCB		167	mg/Kg	100	0.10

Sample: 150947 - 6"

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC04195	Date Analyzed:	8/10/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03646	Date Prepared:	8/9/00

Param	Flag	Result	Units	Dilution	RDL
PCB		18	mg/Kg	10	0.10

Sample: 150948 - 12"

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC04195	Date Analyzed:	8/10/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03646	Date Prepared:	8/9/00

Param	Flag	Result	Units	Dilution	RDL
PCB		4	mg/Kg	10	0.10

Sample: 150949 - 18"

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC04195	Date Analyzed:	8/10/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03646	Date Prepared:	8/9/00

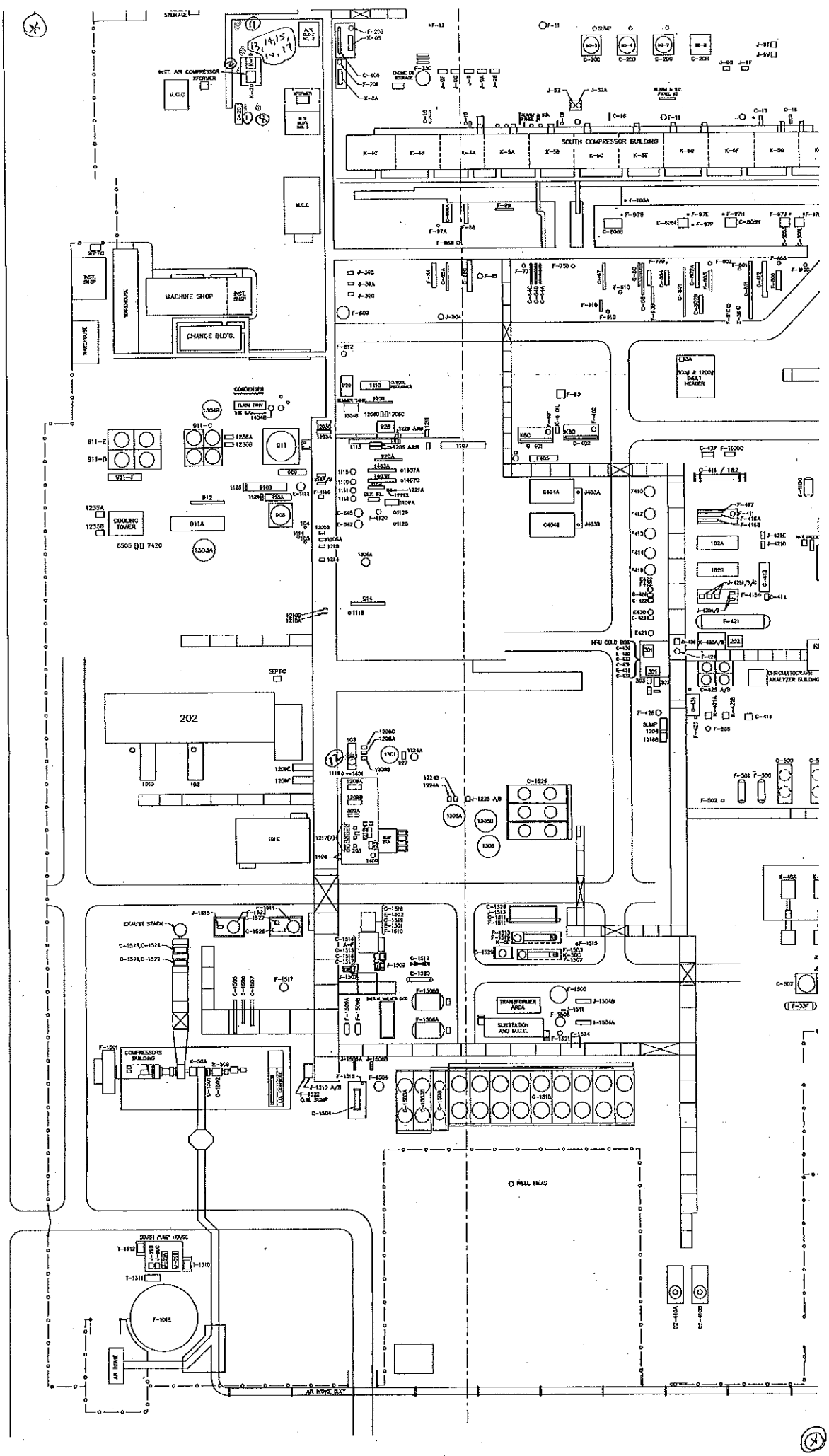
Param	Flag	Result	Units	Dilution	RDL
PCB		5	mg/Kg	10	0.10

Sample: 150950 - 24"

Analysis:	PCB	Analytical Method:	E 8082	QC Batch:	QC04266	Date Analyzed:	8/6/00
Analyst:	ML	Preparation Method:	N/A	Prep Batch:	PB03707	Date Prepared:	8/6/00

Param	Flag	Result	Units	Dilution	RDL
PCB		2.55	mg/Kg	0.10	0.10

Quality Control Report
Method Blank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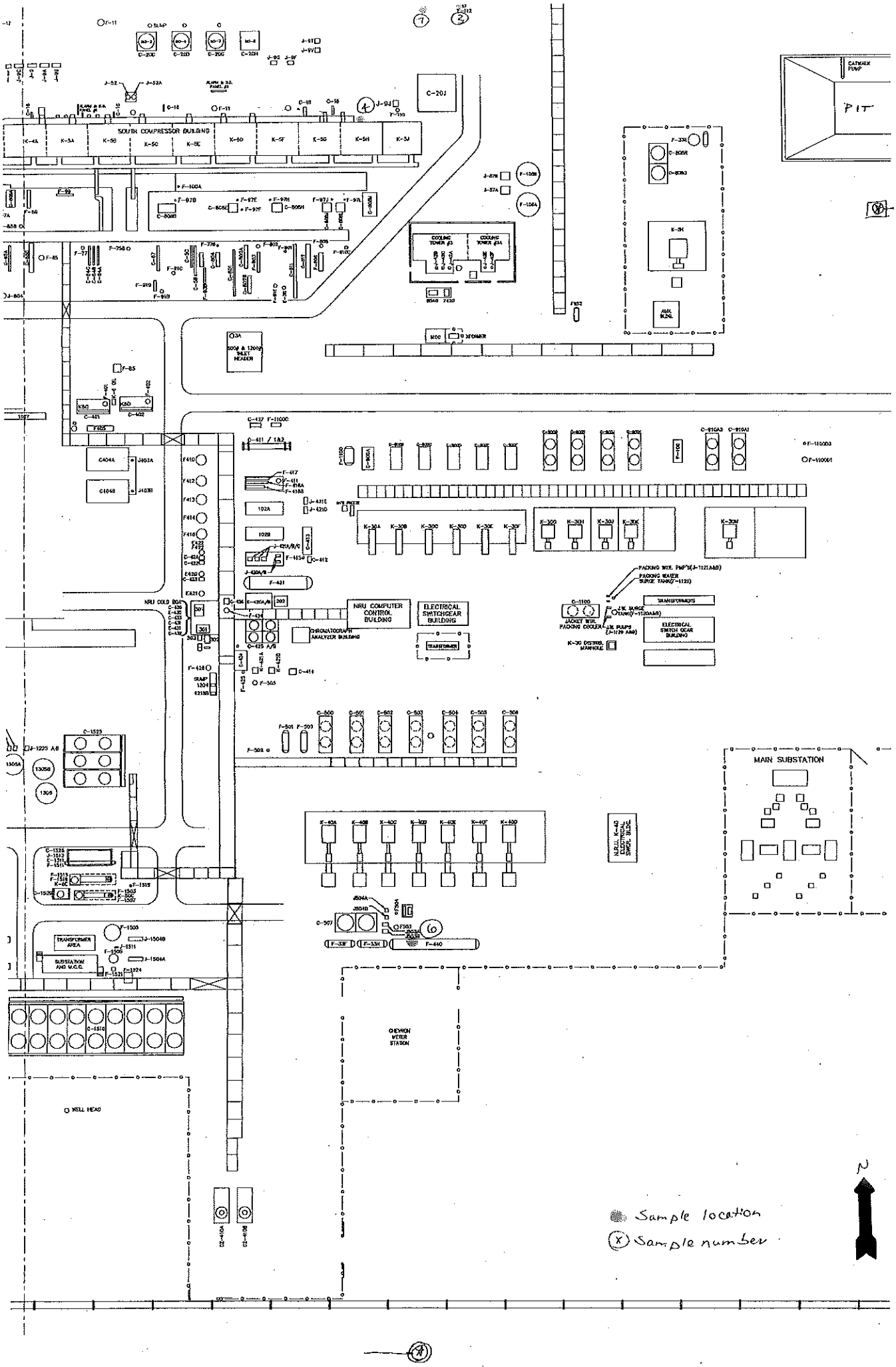
MACHINE SHOP
CHANGE BLD'G.
WAREHOUSE
MCC
SEPTIC
CONDENSER
COOLING TOWER
202
COMPRESSORS BUILDING
EXHAUST STACK
TRANSFORMER AREA
SUBSTATION AND M.C.C.
WELL HEAD
SOUR PUMP HOUSE
AIR HOUSE
AIR HOUSE DUCT
HRU COLD BOX
CHROMATOGRAPH ANALYZER BUILDING
N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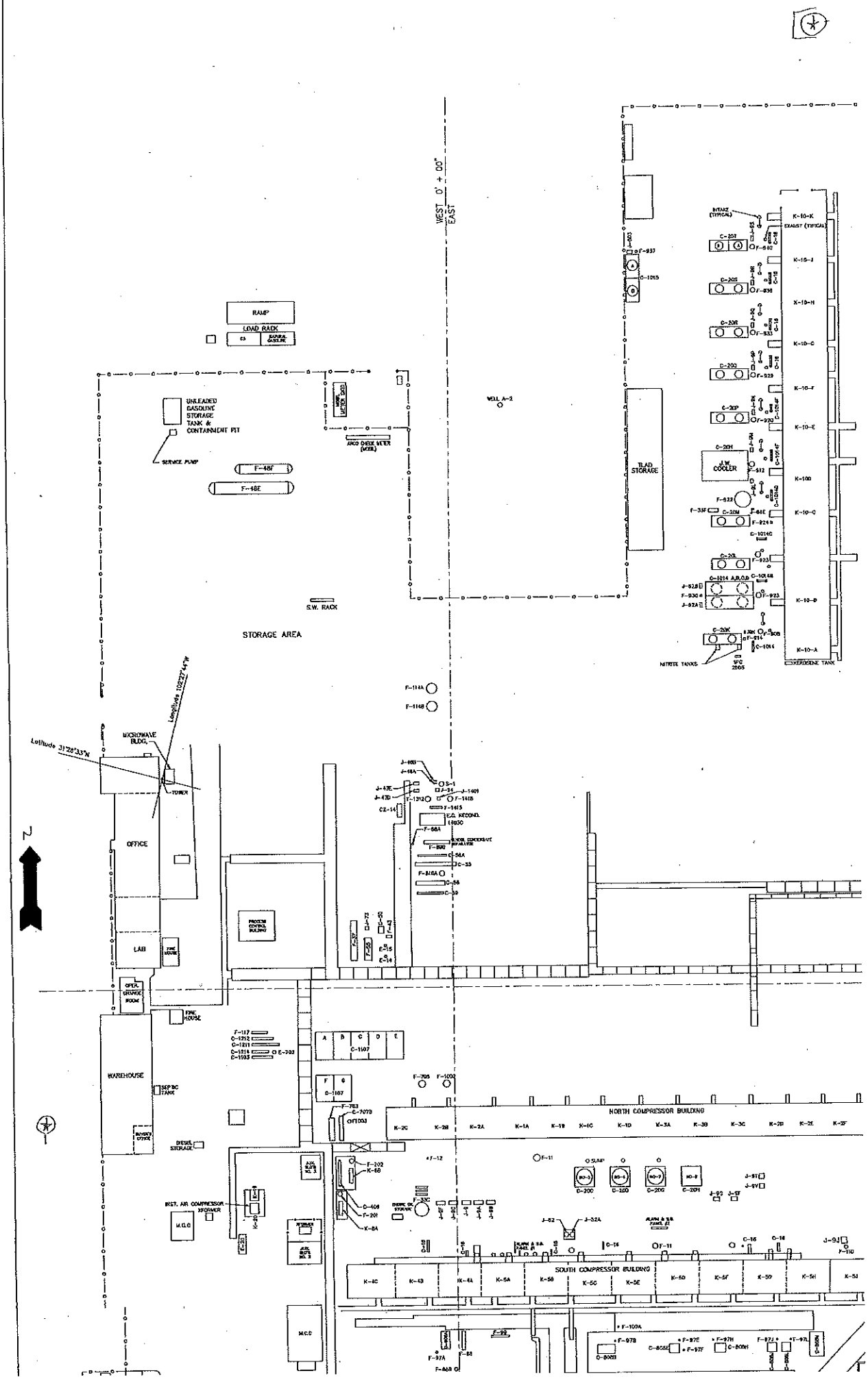
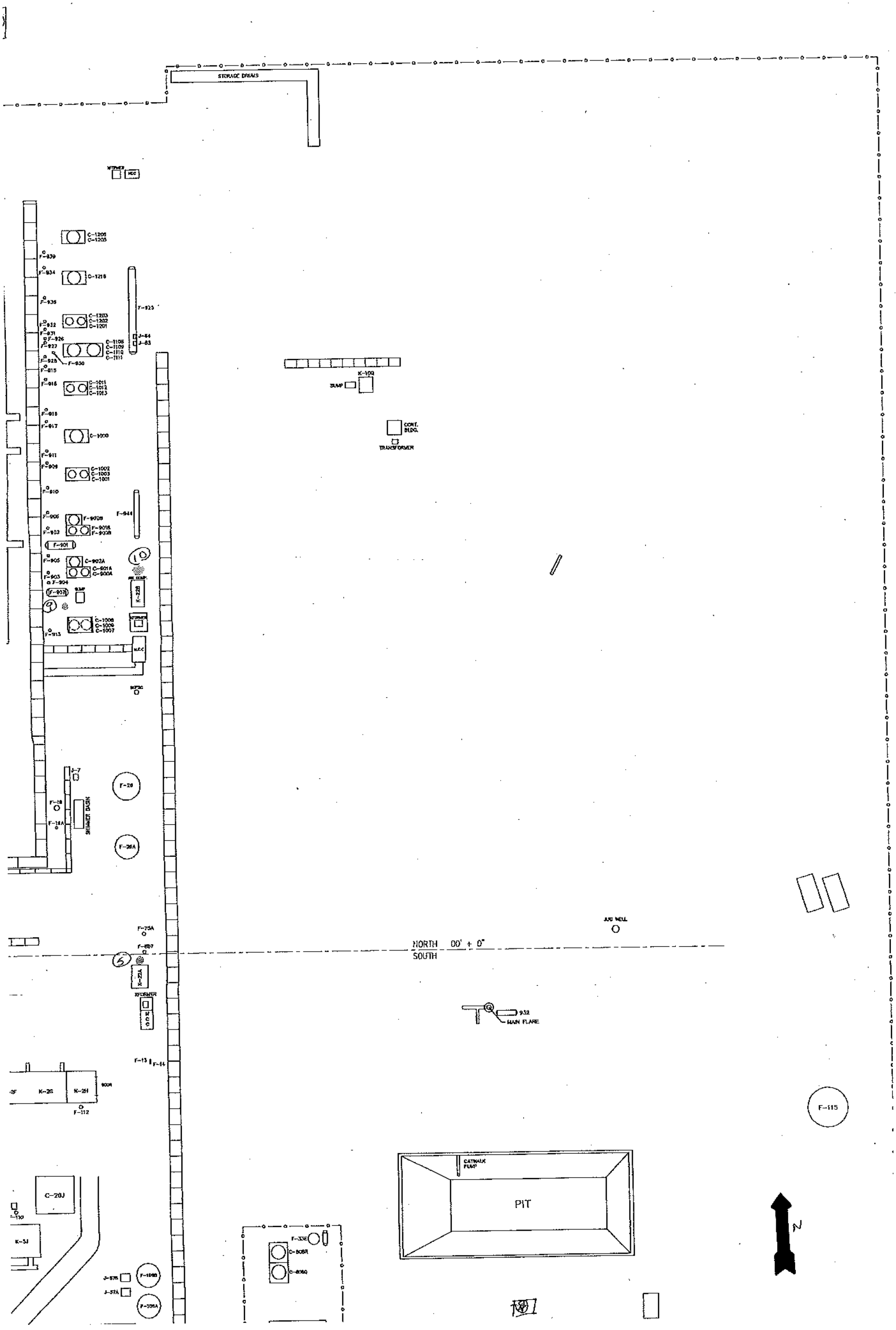
PIT
MAIN SUBSTATION
NRU COMPUTER CONTROL BUILDING
ELECTRICAL SWITCHGEAR BUILDING
CHROMATOGRAPH ANALYZER BUILDING
TRANSFORMER AREA
SUBSTATION AND M.C.C.
OLEFIN METER STATION
WELL HEAD
Sample location
Sample number
N


F. M. 1601 HWY.
WEST 0' + 00" EAST
RAMP
LOAD RACK
UNLEADED GASOLINE STORAGE TANK & CONTAINMENT PIT
SERVICE PUMP
F-48F
F-48E
WELL A-2
TLAD STORAGE
S.W. RACK
STORAGE AREA
J.W. COOLER
NITRITE TANKS
KEROSENE TANK
Latitude 31°28'33"N
Longitude 102°27'47"W
MICROWAVE BLDG.
TOWER
OFFICE
LAB
PROCESS CONTROL BUILDING
OFFICE/ CHANGE ROOM
FIRE HOUSE
WAREHOUSE
SEPTIC TANK
BUYER'S OFFICE
DIESEL STORAGE
INST. AIR COMPRESSOR
M.C.C.
NORTH COMPRESSOR BUILDING
SOUTH COMPRESSOR BUILDING


STORAGE DRUMS
K-100
SUMP
CONT. BLDG.
TRANSFORMER
C-1000
K-22B
F-26
SKIMMER BASIN
F-26A
F-75A
NORTH 00' + 0"
SOUTH
K-22A
XFORMER
MAIN FLARE
JUG WELL
F-115
CATWALK
PUMP
PIT
K-2G
K-2H
F-112
C-20J
K-5J
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C-805Q
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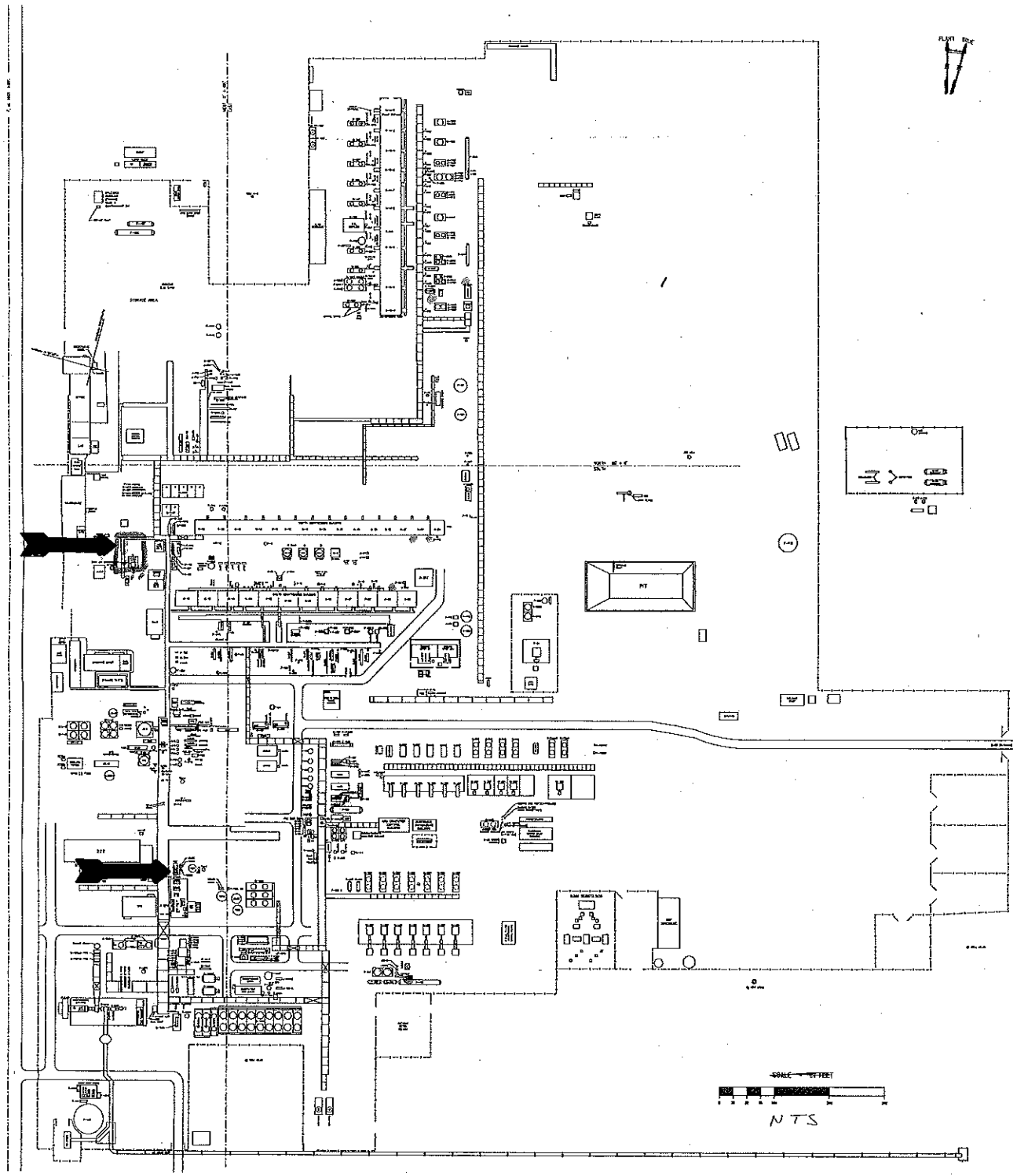
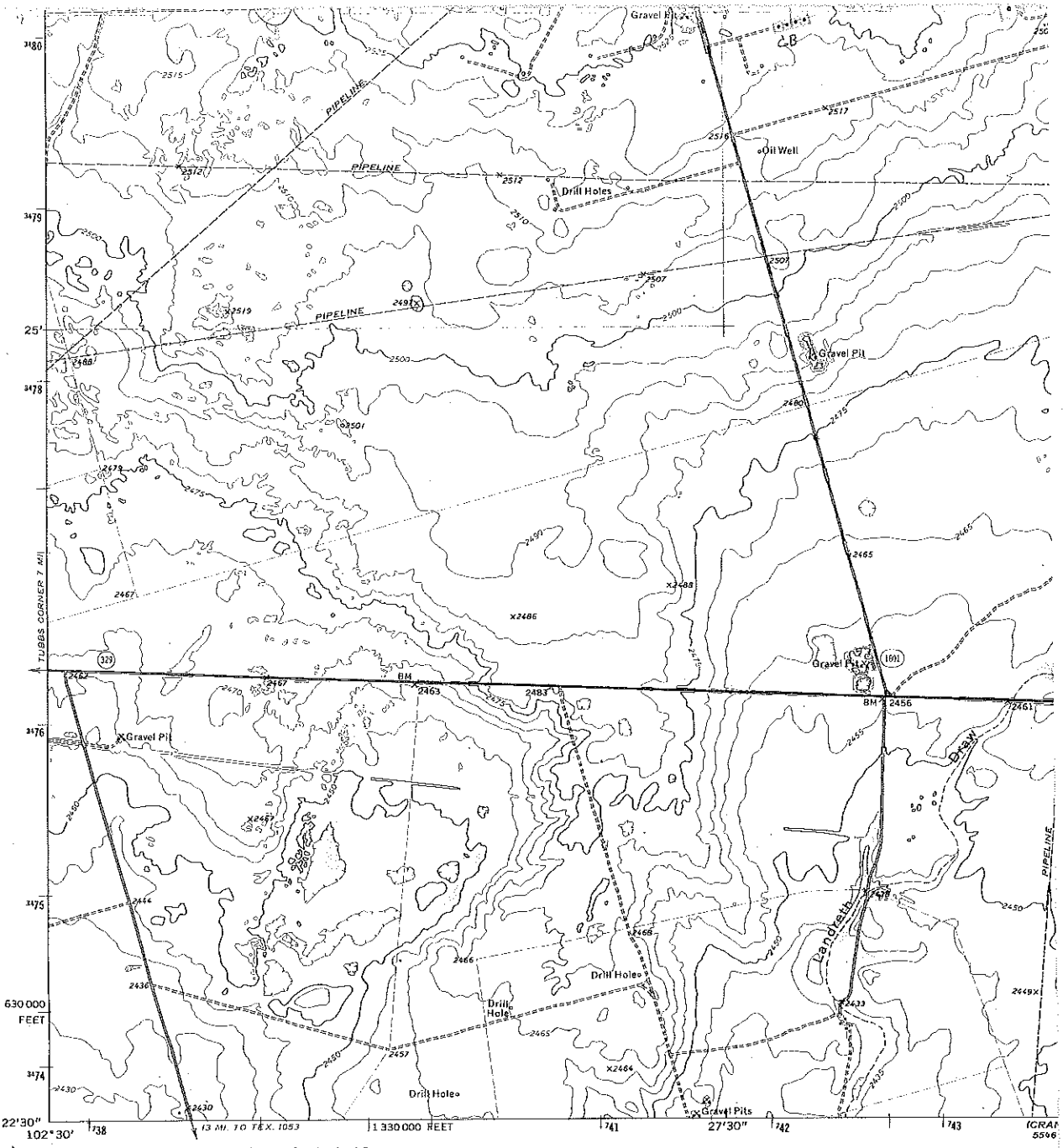


proposed remediation sites

sample locations



Mapped, edited, and published by the Geological Survey

Control by USGS and NOS/NOAA

Topography by photogrammetric methods from aerial photographs taken 1972. Field checked 1974

Projection and 10,000-foot grid ticks: Texas coordinate system, central zone (Lambert conformal conic) 1000-meter Universal Transverse Mercator grid ticks, zone 13, shown in blue. 1927 North American datum

Fine red dashed lines indicate selected fence lines

6446 I SE
(JUAN CORDONA LAKE)

MN
GN
1°20'
24 MILS
10°
178 MILS

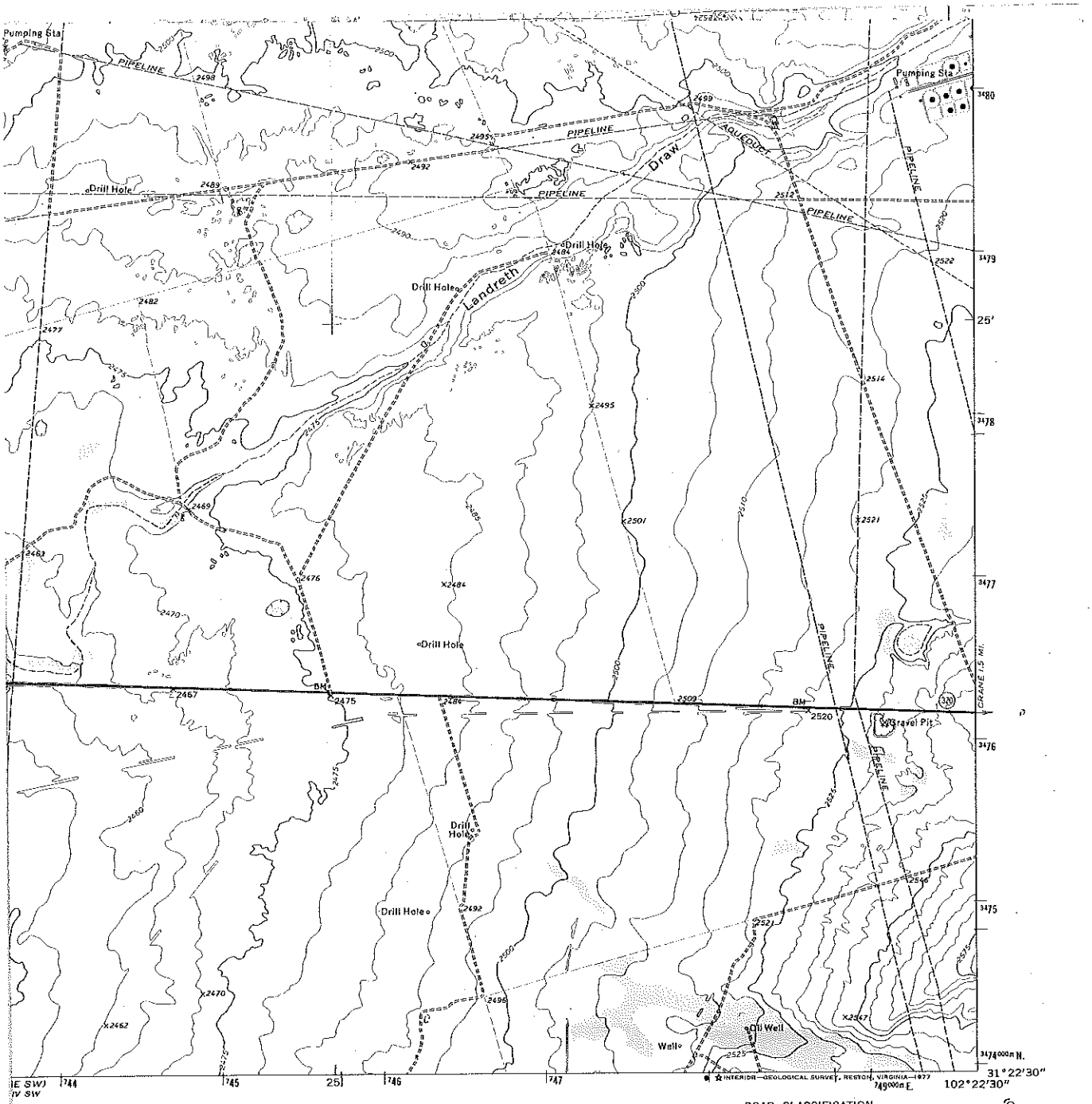
UTM GRID AND 1974 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE

1 1/2
1000 0 1000 2000
1 .5

CONTOUR INT
NATIONAL GEODETIC VE

THIS MAP COMPLIES WITH NATI
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVE
A FOLDER DESCRIBING TOPOGRAPHIC MAP



1:24 000

1 MILE

4000 5000 6000 7000 FEET

1 KILOMETER

ERVAL 5 FEET
RTICAL DATUM OF 1929

ONAL MAP ACCURACY STANDARDS
R, COLORADO 80225, OR RESTON, VIRGINIA 22092
S AND SYMBOLS IS AVAILABLE ON REQUEST

QUADRANGLE LOCATION

ROAD CLASSIFICATION

Primary highway, hard surface

Secondary highway, hard surface

Light-duty road, hard or improved surface

Unimproved road

Interstate Route U. S. Route State Route

INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1977

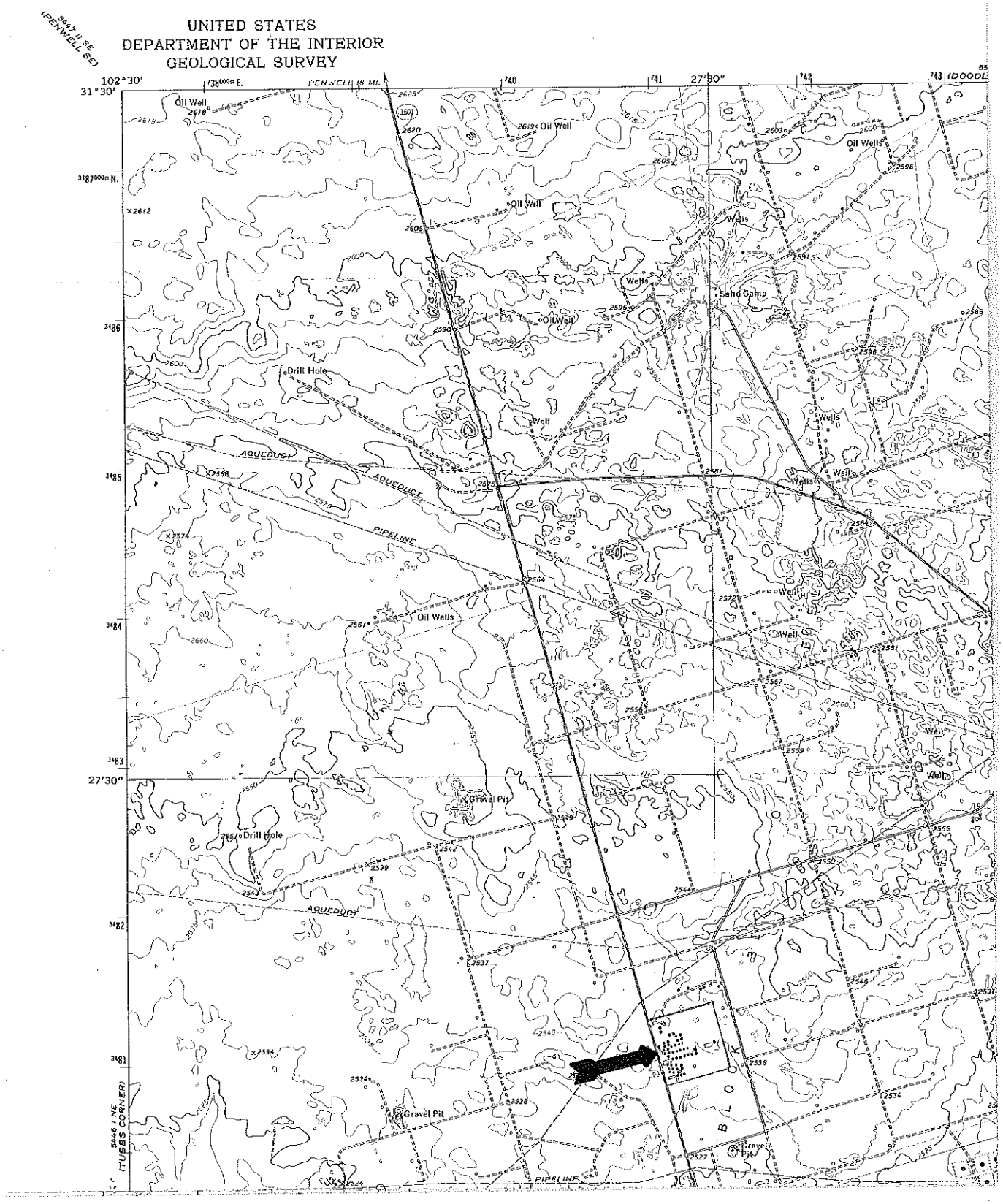
CRANE NW, TEX.

N3122.5—W10222.5/7.5

1974

AMS 5546 IV NW—SERIES V882

CRANE NW QUADRANGLE
TEXAS–CRANE CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)


UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY
102°30'
31°30'
27'30"
738000m E.
PENWELL 18 MI.
Oil Well
Oil Wells
Wells
Sand Camp
Drill Hole
Well
AQUEDUCT
PIPELINE
Gravel Pit
3487000m N.
3486
3485
3484
3483
3482
3481
5446 I NE
(TUBBS CORNER)

August 13, 2002

Mr. Gerald Rivera
Maintenance Supervisor
British Petroleum, Block 31 Plant
1501 FM 1601
Crane, TX 79731-6512

Dear Mr. Rivera:

A representative of EPA Region 6 conducted a polychlorinated biphenyl (PCB) inspection at your facility under the authority of Section 11 of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2610, on March 20, 2002. During this inspection, no PCB Equipment was observed by the Inspector. Enclosed is a copy of the inspection report which is provided for your information.

If you have any questions regarding this report or the TSCA PCB regulations, please contact Ms. Lou Roberts, Regional PCB Coordinator, at (214) 665-7579.

Sincerely yours,

Mark Hansen
Chief
Toxics Enforcement Section

Enclosure

6EN-AT:LROBERTS:lmr:08/13/02:x7579:BRITISH PETROLEUM INSP LTR
AI/TS/PCB TXD000802918

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

August 13, 2002

Mr. Gerald Rivera
Maintenance Supervisor
British Petroleum, Block 31 Plant
1501 FM 1601
Crane, TX 79731-6512

Dear Mr. Rivera:

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Sincerely yours,

for Mark Hansen
Chief
Toxics Enforcement Section

Enclosure

LOG NO.: _____

DATE REPORT REC'D.: _____

DATE LOGGED: _____

~~DATE~~ NUMBER: _____

TSCA Cooperative Agreement
Texas Department of Health
Reviewers Summary

Facility: British Petroleum, Block 31 Plant

Date of Inspection: March 20, 2002

Date mailed to EPA: July 11, 2002

Notice of Inspection:	Yes
TSCA Confidentiality Notice:	Yes
Receipt for Samples and Documents:	Yes
Samples:	No
Chain of Custody Record:	No
Pictures:	Yes

Comments on Report: See narrative.

Compliance Evaluation: It appeared that British Petroleum, Block 31 Plant, was in compliance with TSCA regulations at the time of the inspection. They were in the process of performing a voluntary clean-up as a result of PCB oil used in the lubrication system of air compressors that had spilled onto the ground.

Recommendation: Close case.

Action Taken: None - closed

Date Reviewed: 8/13/02 Lou Roberts

(Signature)

SECOND REVIEW

Date Reviewed: _____

(Signature)

SIC 2911

formerly ARCO PERMIAN

PCB Waste Handler Database

Facility Information

General Information:

Form ID: 6610 **PADS ID:** TXD000802918 **Form Code** 1

Facility Information:

Facility Name: Block 31 Plant

Facilty Owner: British Petroleum (formerly ARCO Permian)

Contact Name: Jim Hill

Phone: (915)334-480 **Ext:** **Federal Facility** ☐

Facility Mailing Address:

1501 FM 1601
Crane, TX 79731-6512

Location of Facility:

1501 FM 1601
Crane, TX 79731-6512

PCB Activity:

Generator:	X	**Disposer:**	
Storer:		**Research:**	
Transporter:		**Smelter:**	

Misc Information:

PADS Information:		**Note PADS Information:**	
Date Created:	10/3/00	**Date Created:**	
Date Signed:	8/14/00	**Last Modified:**	
Last Modified:	10/3/00		

Note PADS - Additional Comments:

PADS Comments:

TSCA PCB COMPLIANCE INSPECTION REPORT

SECTION A - GENERAL FACILITY SUMMARY

1. Name of Facility: British Petroleum, Block 31 Plant

   Facility Address: 1501 FM 1601

   Crane, Texas 79731-6512, Crane County

   Responsible Party: British Petroleum

   Britannic House Moor Lane

   London EC2Y9BU

2. Name: The Lord Browne of Madingley, FREng, CEO +44 (0)171 496 4000

3. Type of Facility: natural gas extraction plant NAICS: 211111

4. Credentials Presented to: Mr. Gerald Rivera, Maintenance Supervisor (915) 334-4802

FACILITY NAME: British Petroleum (Arco Permian), Block 31 Plant
EPA ID NUMBER: TXD000802918

SECTION B - INSPECTION/REVIEW COMMENTS

1. INSPECTED BY: Gordon Leeks, R.S. Texas Dept. Of Health, March 20, 2002
(Signature) (Agency and Date of Inspection)
(Gordon Leeks, R.S.)

2. REVIEWED BY: _____ Texas Dept. Of Health, 7/9/02
(Signature) (Agency and Date of Review)
(John O. Onyenobi, P.E., NSPE, Program Administrator, Asbestos Program Branch)

3. Comments

British Petroleum, Block 31 Plant, located in Crane, Texas, was targeted for a polychlorinated biphenyl (PCB) inspection on the 2001 - 2002 Texas state neutral scheme under the "Refining" category. Available records indicate that a PCB compliance inspection had never been conducted at this facility.

Inspection Narrative

On March 20, 2002, at 9:27 a.m., Mr. Gordon Leeks, R.S., TSCA Inspector, arrived at British Petroleum, Block 31 Plant located at 1501 FM 1601, Crane, Texas. The inspector presented his credentials to Mr. Gerald Rivera, Maintenance Supervisor and explained the purpose of his visit. Mr. Rivera signed the Notice of Inspection form and the TSCA Inspection Confidentiality Notice. Mr. Leeks provided him with a copy of each document for his records.

Mr. Rivera explained that PCB oil was used in the lubrication system of air compressors that had been removed prior to 1981. According to Mr. Rivera, the property was sold in 2000. They began testing for PCBs in the soil in areas that may have been contaminated by the lubrication system. The discovery of PCBs in the soil was reported to the EPA Region VI PCB Coordinator and an approved clean up of the affected areas was begun. The soil was excavated down to a depth where no PCBs were detected. The soil was placed in roll off boxes on site, which were removed within five days after they were filled. It is estimated that it took approximately two days to fill a roll off box. Mr. Rivera also stated that records of the cleanup could be obtained at the British Petroleum office in Midland, Texas.

Photograph #1 shows the remediation site where an air compressor and dehydrator were located prior to 1981. The actual location is a concrete slab in the top rear area of the photograph. Photograph #2 is a close-up of the area where the soil was removed.

There were no annual document logs or manifests stored at this facility. Those records are available from Ms. Margret Lowe, Environmental Health and Safety Specialist, British Petroleum, located at 600 North Marienfeld Street, Midland, TX 79701.

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

SECTION C - RECORDKEEPING/INVENTORY (40 CFR PART 761.180 - § 761.180(a) PCBs AND PCB ITEMS IN SERVICE OR PROJECTED FOR DISPOSAL

1. Since July 2, 1978, has facility had in service, stored for future use, or stored for disposal:
   (a) One or more PCB Transformers? Yes__ No✓
   (b) 50 or more PCB Large High or Low Voltage Capacitors? Yes__ No✓
   (c) 45 kilograms (99.4 lbs.) or more of PCB chemicals, substances, or mixtures contained in containers? (50 ppm or greater) Yes✓ No__
2. PCBs and PCB Items used, stored or handled at the facility since 7/02/78:

Note: KG of oil not KG of PCBs in oil	TOTAL REMAINING IN SERVICE AT TIME OF INSP	NUMBER OF THOSE MARKED	TOTAL REMOVED FROM SERVICE SINCE 7/02/78	STORED FOR FUTURE USE AT TIME OF INSP	STORED FOR DISPOSAL AT TIME OF INSP	TOTAL SENT FOR DISPOSAL SINCE 7/02/78	TOTAL NUMBER RECLASS-IFIED SINCE 7/02/78
A) # OF PCB TRANSFORMERS	-0-	-0-		-0-	-0-		
B) KG OF PCBs IN TRANSFORMERS							
C) # OF LARGE LOW VOLTAGE CAPACITORS							
D) # OF LARGE HIGH VOLTAGE CAPACITORS							
E) # OF PCB CONTAINERS							
F) KG OF PCBs IN CONTAINERS							
G) CONTENTS OF CONTAINERS*							
H) # OF PCB ARTICLE CONTAINERS							
I) KG OF PCBs IN CONTAINERS							
J) OTHER (IDENTIFY)							

* soil, liquid, cleanup debris, etc.

FACILITY NAME BP Block 31
EPA ID NUMBER TXD 000802918

3. Does the facility maintain Annual Documents? Yes___No___N/A____

(For the latter half of 1978 and the calendar years 1979 through 1989)
(This document shall be prepared by July 01, and cover the previous calendar year and be maintained for 3 years after facility ceases using or storing PCBs and PCB Items in the prescribed quantities)

If YES, give the years for which Annual Documents are available:

_____ _____ _____ _____ _____ _____ _____

_____ _____ _____ _____ _____ _____ _____

Give the years for which Annual Documents are required:

_____ _____ _____ _____ _____ _____ _____

_____ _____ _____ _____ _____ _____ _____

If NO, identify other sources of information:
(Example: waste manifests, certificates of disposal, work orders, other - identify)

_____

_____

4. Does the facility's Annual Document required for 1989 cover the period from January 1, 1989 to February 5, 1990? § 761.180(a) [1990] Yes___No___N/A__

5. Do records indicate the date(s) when PCBs and PCB Items were:

	§ 761.180(a)(1)[1989]	(Annual Document)	(Basic Records)
(a)	Removed from service?	Yes___No___N/A___	Yes___No___N/A__
(b)	Placed into storage for disposal?	Yes___No___N/A___	Yes___No___N/A__
(c)	Placed into transport for disposal?	Yes___No___N/A___	Yes___No___N/A__

For any "NO" response, Explain:_____

_____

(use additional pages if needed)

6. Do records indicate the following for equipment no longer in service:

		(Annual Document)	(Basic Records)
(a)	Contents of PCB Containers? (e.g., liquid, soil, cleanup debris, capacitors) § 761.180(a)(1)(i)[1989]	Yes___No___N/A___	Yes___No___N/A__
(b)	Total weight in kilograms of PCBs and PCB Items in PCB Containers? § 761.180(a)(1)(i)[1989]	Yes___No___N/A___	Yes___No___N/A__
(c)	Total number of PCB Transformers? § 761.180(a)(1)(ii)[1989]	Yes___No___N/A___	Yes___No___N/A__
(d)	Total weight in kilograms of PCBs in PCB Transformers? § 761.180(a)(1)(ii)[1989]	Yes___No___N/A___	Yes___No___N/A__
(e)	Total number of PCB Large High or Low Voltage Capacitors? § 761.180(a)(1)(iii)[1989]	Yes___No___N/A___	Yes___No___N/A__

For any "NO" response, Explain:_____

_____

(use additional pages if needed)

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

7. Do records indicate the total quantities of PCBs and PCB Items remaining in service (in use or stored for reuse) at the end of the calendar year categorized as follows: § 761.180(a)(3) [1989]

	(Annual Document)	(Basic Records)
(a) Contents of PCB Containers? (e.g., liquid, soil, cleanup debris, capacitors) § 761.180(a)(3)(i) [1989]	Yes___No___N/A___	Yes___No___N/A___
(b) Total weight in kilograms of PCBs and PCB Items in PCB Containers? § 761.180(a)(3)(i) [1989]	Yes___No___N/A___	Yes___No___N/A___
(c) Total number of PCB Transformers? § 761.180(a)(3)(ii) [1989]	Yes___No___N/A___	Yes___No___N/A___
(d) Total weight in kilograms of PCBs in PCB Transformers? § 761.180(a)(3)(ii) [1989]	Yes___No___N/A___	Yes___No___N/A___
(e) Total number of PCB Large High or Low Voltage Capacitors? § 761.180(a)(3)(iii) [1989]	Yes___No___N/A___	Yes___No___N/A___

For any "NO" response, Explain:_____

_____

(use additional pages if needed)

8. Does the facility maintain Annual Document Logs? Yes___No___N/A___
(For the period 2/5/90 thru 12/31/90 [calendar year 1990] and calendar years thereafter)
(This document shall be prepared by July 01, and cover the previous calendar year and be maintained for 3 years after facility ceases using or storing PCBs and PCB Items in the prescribed quantities) § 761.180(b) [1990]

If YES, give the years for which Annual Document Logs are available:

_____ _____ _____ _____ _____ _____ _____

Give the years for which Annual Document Logs are required:

_____ _____ _____ _____ _____ _____ _____

9. Does the facility (Effective 2/5/90) maintain annual records?
(Shall contain all signed manifests generated by the facility during the calendar year and all Certificates of Disposal that have been received by the facility during the calendar year and be maintained for 3 years after facility ceases using or storing PCBs and PCB Items in the prescribed quantities) § 761.180(a)(1) [1990]
Yes___No___N/A___

If YES, give the years for which annual records are available:

_____ _____ _____ _____ _____ _____ _____

Give the years for which annual records are required:

_____ _____ _____ _____ _____ _____ _____

If NO, Explain:_____

_____

_____

FACILITY NAME BP Block 31
EPA ID NUMBER TXD000802918

10. **IF QUESTION 8 IS ANSWERED YES,**
Does the facility's written Annual Document Log include:
(a) Name, address, EPA identification number, and calendar year covered? § 761.180(a)(2)(i) [1990] Yes___No___

If NO, Explain:_____

_____

(use additional pages if needed)

(b) Unique manifest number of every manifest generated during calendar year? Yes___No___
§ 761.180(a)(2)(ii) [1990]

(1) From each manifest and for unmanifested waste that may be stored at the facility, the following information:

(a) For Bulk PCB waste (e.g., in a tanker or truck): § 761.180(a)(2)(ii)(A) [1990]
(1) weight in kilograms? Yes___No___N/A__
(2) first date removed from service for disposal? Yes___No___N/A__
(3) date placed into transport for off-site storage or disposal? Yes___No___N/A_
(4) date of disposal? (if known) Yes___No___N/A_

(b) For PCB Article (e.g., transformer, capacitor): § 761.180(a)(2)(ii)(B) [1990]
(1) serial number (if available) or other means of identification? Yes___No___N/A__
(2) weight in kilograms of PCB waste in each? Yes___No___N/A__
(3) date removed from service for disposal? Yes___No___N/A__
(4) date placed in transport for off-site storage or disposal? Yes___No___N/A__
(5) date of disposal? (if known) Yes___No___N/A__

(c) For PCB Container: § 761.180(a)(2)(ii)(C) [1990]
(1) unique number identifying each? Yes___No___N/A__
(2) description of contents of each? Yes___No___N/A__
(e.g., liquid, soil, cleanup debris, etc.)
(3) total weight of material in kilograms in each? Yes___No___N/A__
(4) first date material placed in each for disposal? Yes___No___N/A__
(5) date each placed in transport for off-site storage or disposal? Yes___No___N/A__
(6) date of disposal? (if known) Yes___No___N/A__

(d) For PCB Article Container: § 761.180(a)(2)(ii)(D) [1990]
(1) unique number identifying each? Yes___No___N/A_
(2) description of contents of each? Yes___No___N/A_
(e.g., pipes, capacitors, electric motors, pumps, etc.)
(3) total weight in kilograms of contents of each PCB Article Container? Yes___No___N/A_
(4) first date a PCB Article placed into each for disposal? Yes___No___N/A_
(5) total weight of the PCB Articles in kilograms in each PCB Article Container? Yes___No___N/A__
(6) date PCB Article Container placed in transport for off-site storage or disposal? Yes___No___N/A__
(7) date of disposal? (if known) Yes___No___N/A__

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

10. Does the facility's written annual document log include (cont'd):
(c) total number by specific type of PCB Articles? Yes___No___N/A___
§ 761.180(a)(2)(iii) [1990]
(d) total weight in kilograms of PCBs in PCB Articles? Yes___No___N/A___
§ 761.180(a)(2)(iii) [1990]
(e) total number of PCB Article Containers? Yes___No___N/A___
§ 761.180(a)(2)(iii) [1990]
(f) total weight in kilograms of the contents of PCB Article Containers? § 761.180(a)(2)(iii) [1990] Yes___No___N/A___
(g) total number of PCB Containers? Yes___No___N/A___
§ 761.180(a)(2)(iii) [1990]
(h) total weight in kilograms of the contents of PCB Containers? § 761.180(a)(2)(iii) [1990] Yes___No___N/A___
(i) total weight in kilograms of bulk PCB waste placed into storage for disposal or disposed in calendar year? Yes___No___N/A___
§ 761.180(a)(2)(iii) [1990]
(j) total number of PCB Transformers remaining in service at the end of the calendar year? § 761.180(a)(2)(iv) [1990] Yes___No___N/A___
(k) total weight in kilograms of PCBs contained in PCB Transformers remaining in service at the end of the calendar year? § 761.180(a)(2)(iv) [1990] Yes___No___N/A___
(l) total number of Large High or Low Voltage PCB Capacitors remaining in service at the end of calendar year? Yes___No___N/A___
§ 761.180(a)(2)(v) [1990]
(m) total weight in kilograms of any PCBs and PCB Items in PCB Containers, including the identification of container contents, remaining in service at end of calendar year? Yes___No___N/A___
§ 761.180(a)(2)(vi) [1990]
(n) record of each telephone call, or other means of verification, made to each designated commercial storer or designated disposer to confirm receipt of PCB waste transported by an independent transporter? Yes___No___N/A___
§ 761.180(a)(2)(viii) [1990]

11. Were any PCBs or PCB Items received from or shipped to another facility owned or operated by the same generator? § 761.180(a)(2)(vii) [1990] Yes___No___N/A___

If YES, is the following information maintained in an Annual Document Log:
(1) From each manifest and for unmanifested waste that may be stored at the facility, the following information:
(a) For Bulk PCB waste (e.g., in a tanker or truck): § 761.180(a)(2)(ii)(A) [1990]
(1) weight in kilograms? Yes___No___N/A___
(2) first date removed from service for disposal? Yes___No___N/A___
(3) date placed into transport for off-site storage or disposal? Yes___No___N/A___
(4) date of disposal? (if known) Yes___No___N/A___

(b) For PCB Article: § 761.180(a)(2)(ii)(B) [1990]
(1) serial number (if available) or other means of identification? Yes___No___N/A___
(2) weight in kilograms of PCB waste in each? Yes___No___N/A___
(3) date removed from service for disposal? Yes___No___N/A___
(4) date placed in transport for off-site storage or disposal? Yes___No___N/A___
(5) date of disposal? (if known) Yes___No___N/A___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

11. Does the facility's written Annual Document Log include (cont'd):

(c) For PCB Container: § 761.180(a)(2)(ii)(C) [1990]

(1) unique number identifying each? Yes___No___N/A___
(2) description of contents of each? Yes___No___N/A___
(e.g., liquid, soil, cleanup debris, etc.)
(3) total weight of material in kilograms in each? Yes___No___N/A___
(4) first date material placed in each for disposal? Yes___No___N/A___
(5) date each placed in transport for off-site storage or disposal? Yes___No___N/A___
(6) date of disposal? (if known) Yes___No___N/A___

(d) For PCB Article Container: § 761.180(a)(2)(ii)(D) [1990]

(1) unique number identifying each PCB Article Container? Yes___No___N/A___
(2) description of contents of each PCB Article Container? (e.g., pipes, capacitors, electric motors, pumps, etc.) Yes___No___N/A___
(3) total weight in kilograms of contents of each PCB Article Container? Yes___No___N/A___
(4) first date a PCB Article placed into each for disposal? Yes___No___N/A___
(5) total weight of the PCB Articles in kilograms in each PCB Article Container? Yes___No___N/A___
(6) date PCB Article Container placed in transport for off-site storage or disposal? Yes___No___N/A___
(7) date of disposal? (if known) Yes___No___N/A___

12. List year(s) when facility began using or storing PCBs in the quantities prescribed in Section C; Question 1; Items a, b, and c. N/A_____
(For example: 1981-1983, 1985, 1987) (attach copy of documentation)

a) PCB Transformers: N/A_____ _____(date) _____(date) _____(date)

b) 50 or more PCB Large High or Low Voltage Capacitors: N/A_____
_____(date) _____(date) _____(date)

c) 45 kilograms or more of PCBs (greater than 50 ppm) contained in PCB Containers: N/A_____ _____(date) _____(date) _____(date)

13. Did facility cease using or storing PCBs in the quantities prescribed in Section C; Question 1; Items a, b, and c? Yes___No___N/A___

If YES, list date(s) of shipment(s) that accomplished this:
[attach copy of manifests(s)]

a) PCB Transformers: N/A_____ _____(date) _____(date) _____(date)

b) 50 or more PCB Large High or Low Voltage Capacitors: N/A_____
_____(date) _____(date) _____(date)

c) 45 kilograms or more of PCBs (greater than 50 ppm) contained in PCB Containers: N/A_____ _____(date) _____(date) _____(date)

FACILITY NAME BP, Block 31
EPA ID NUMBER FLD 000 802918

14. If owners or operators maintain more than one facility that has PCBs in the quantities prescribed in SECTION C, Question 1, Items a, b, and c are records and documents kept at a single/central location? Yes___ No___ N/A___
§ 761.180(a) [1989,1990]

If YES, list location: _____

_____

15. For PCBs and PCB Items removed from service, do the records indicate the location of the initial disposal or storage facility and the Name of the owner or operator of the facility? § 761.180(a)(2) [1989] Yes___ No___ N/A___

If YES, list name, location, type of facility:
(i.e., broker, incinerator, boiler, commercial storer, landfill, etc)

(Name of Facility)	(Owner/Operator)	(Location)	(Type)
(Name of Facility)	(Owner/Operator)	(Location)	(Type)
(Name of Facility)	(Owner/Operator)	(Location)	(Type)
(Name of Facility)	(Owner/Operator)	(Location)	(Type)
(Name of Facility)	(Owner/Operator)	(Location)	(Type)

16. Identify calendar year(s) for which Annual Documents and Annual Document Logs were reviewed. N/A_____

Annual Documents

_____ _____ _____ _____ _____ _____ _____ _____ _____

Annual Document Logs

_____ _____ _____ _____ _____ _____ _____ _____ _____

17. Any deficiencies in recordkeeping must be described below, including information on the amount of PCBs involved. Copy deficient documents or at least a sample quantity. Quantify PCB weights and PCB Items not properly recorded. Deficiencies: YES___ NO___ N/A___

_____

_____

_____

(use additional pages if needed)

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

Section applies to this facility Yes___ No✓

SECTION C - RECORDKEEPING/INVENTORY (40 CFR PART 761.180)
§ 761.180(b) - DISPOSERS AND COMMERCIAL STORERS **OF PCB WASTE**

1. List date(s) when facility began its commercial storage or disposal operations. _____ _____ _____ _____

2. Has commercial storage or disposal facility ceased its storage or disposal operations? Yes___No___

   a) If YES, give dates: _____ _____ _____ _____ _____

   b) If YES, did facility notify the EPA Regional Office which has jurisdiction within 60 days? § 761.180(b) [1990] Yes___No___

3. Since July 2, 1978, has storage or disposal facility (including high efficiency boiler operations) prepared and maintained an Annual Document prepared by July 01, which includes information for PCBs and PCB Items that were handled at the facility during the previous calendar year?
   (shall be prepared for the latter half of 1978 and the calendar years 1979 through 1989 and be maintained for 3 years after the facility is no longer used for the storage or disposal of PCBs and PCB Items - *except Chemical Waste Landfills shall maintain the document at least 20 years after the landfill is no longer used for the disposal of PCBs and PCB Items*) § 761.180(b) [1989] Yes___No___

   If YES, give the years for which Annual Documents are available:

   _____ _____ _____ _____ _____ _____

   _____ _____ _____ _____ _____ _____

   If NO, identify other sources of information:
   (Example: waste manifests, certificates of disposal, work orders, other - identify)

   _____

   _____

   _____

4. Does the facility's Annual Document required for 1989 cover the period from January 1, 1989 to February 5, 1990? § 761.180(b) [1990] Yes___No___N/A___

5. Does the facility's Annual Document include the date(s) when PCBs and PCB Items were received by the facility during the previous calendar year for storage or disposal? § 761.180(b)(1) [1989] Yes___No___N/A___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

6. Does the facility's Annual Document include for PCBs and PCB Items received by the facility during the previous calendar year: § 761.180(b)(1) [1989]

   (a) identification of the facility from whom the PCBs were received? Yes___No___N/A___

   (b) identification of the owner or operator of the facility from whom the PCBs were received? Yes___No___N/A___

7. Does the facility's Annual Document include the date(s) when any PCBs and PCB Items were disposed of at the facility or transferred to another disposal or storage facility? § 761.180(b)(2) [1989] Yes___No___N/A___

8. Does the facility's Annual Document include for PCBs and PCB Items disposed of at the facility or transferred to another disposal or storage facility, the identification of the specific types of PCBs and PCB Items? § 761.180(b)(2) [1989] Yes___No___N/A___

9. Does the facility's Annual Document include for PCBs and PCB Items that are transferred to other storage or disposal facilities, the identification of the facility to which such PCBs and PCB Items were transferred? § 761.180(b)2) [1989] Yes___No___N/A___

10. Does the facility's Annual Document include a summary of the total weight in kilograms of PCBs and PCB Articles in containers that have been handled at the facility during the previous calendar year? § 761.180(b)(3) [1989] Yes___No___N/A___

    If YES, is the information included for:
    (a) What was received during the year? Yes___No___
    § 761.180(b)(3)(i) [1989]
    (b) What was transferred to other facilities during year? Yes___No___
    § 761.180(b)(3)(ii) [1989]
    (c) What was retained at the facility at end of the year? Yes___No___
    § 761.180(b)(3)(iii) [1989]

11. Does the facility's Annual Document include the identification of contents of PCB Containers? § 761.180(b)(3)(iii) [1989] Yes___No___N/A___

12. Does the facility's Annual Document include the total number of any PCB Articles or PCB Equipment not in PCB Containers? Yes___No___N/A___
    § 761.180(b)(4) [1989]

    If Yes, is the information included for:
    (a) Received during the calendar year? Yes___No___N/A___
    (b) Transferred to other storage or disposal facilities during the calendar year? Yes___No___N/A___
    (c) Remaining on the facility site at the end of the calendar year? Yes___No___N/A___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

13. Does the facility's Annual Document include a summary of the total weight of PCBs contained in PCB Transformers that have been handled at the facility during the previous calendar year? Yes___No___N/A__
§ 761.180(b)(3) [1989]

If YES, is the information included for:
(a) What was received during the year? Yes___No___
§ 761.180(b)(3)(i) [1989]

(b) What was transferred to other facilities during year? Yes___No___
§ 761.180(b)(3)(ii) [1989]

(c) What was retained at the facility at the end of year? Yes___No___
§ 761.180(b)(3)(iii) [1989]

14. Does the facility's Annual Document include the identification of the specific types of PCB Articles and PCB Equipment received, transferred, or remaining on the facility site? § 761.180(b)(4) [1989]
Yes___No___N/A__

15. Does the facility (Effective 2/5/90) maintain annual records?
§ 761.180(b) & § 761.180(b)(1) [1990]
(All signed manifests generated or received at the facility during the calendar year and all Certificates of Disposal that have been generated or received by the facility during the calendar year. Document shall be maintained for 3 years after facility is no longer used for the storage or disposal of PCBs and PCB Items except chemical waste landfills shall maintain the document for 20 years.)
Yes___No___

If YES, give the years for which annual records are available?

_____ _____ _____ _____ _____

If NO, Explain:_____

_____

_____

16. Since February 5, 1990, has commercial storage or disposal facility including high efficiency boiler operations) prepared and maintained an **Annual Document Log** (prepared by July 01), which includes information for PCBs and PCB Items that were handled at the facility during the previous calendar year? § 761.180(b) [1990] Yes___No___
(Document shall be maintained for 3 years after facility is no longer used for the storage or disposal of PCBs and PCB Items except chemical waste landfills shall maintain the document for 20 years)

If YES, give the years for which Annual Document Logs are available:

_____ _____ _____ _____ _____ _____

FACILITY NAME BP Block 31
EPA ID NUMBER TXD 000802918

17. IF QUESTION 16 IS ANSWERED "YES", Does the facility's written Annual Document Log include: § 761.180(b)(2) [1990]

(a) Name, address, EPA identification number, and calendar year covered? § 761.180(b)(2)(i) [1990] Yes___No___

(b) Unique manifest number and the name and address of the facility that generated the manifest for every manifest generated or received by the facility during calendar year? § 761.180(b)(2)(ii) [1990] Yes___No___

(1) From each manifest and for unmanifested waste that may be stored at the facility, the following information:

(a) For Bulk PCB waste (e.g., in a tanker or truck): § 761.180(b)(2)(ii)(A) [1990]
- (1) weight in kilograms? Yes___No___
- (2) first date PCB waste placed in tanker or truck for disposal? Yes___No___
- (3) date received at facility? Yes___No___
- (4) date placed into transport for off-site storage or disposal? Yes___No___N/A_
- (5) confirmed date of disposal? Yes___No___

§ 761.180(b)(2)(ii)(E) [1990]

(b) For PCB Article not in PCB Container (e.g., transformer, capacitor): § 761.180(b)(2)(ii)(B) [1990]
- (1) serial number (if available) or other means of identification? Yes___No___
- (2) weight in kilograms of PCB waste in each? Yes___No___
- (3) date removed from service for disposal? Yes___No___
- (4) date received at the facility? Yes___No___
- (5) date placed in transport for off-site storage or disposal? Yes___No___N/A_
- (6) confirmed date of disposal? Yes___No___

§ 761.180(b)(2)(ii)(E) [1990]

(c) For PCB Container: § 761.180(b)(2)(ii)(C) [1990]
- (1) unique number identifying each? (assigned by generator) Yes___No___
- (2) description of contents of each? (e.g., liquid, soil, cleanup debris, etc.) Yes___No___
- (3) total weight of PCB waste in kg. in each? Yes___No___
- (4) first date PCB waste placed in each for disposal? Yes___No___
- (5) date received at the facility? Yes___No___
- (6) date each placed in transport for off-site storage or disposal? Yes___No___N/A_
- (7) confirmed date of disposal? Yes___No___

§ 761.180(b)(2)(ii)(E) [1990]

17. Does the facility's written Annual Document log include (cont.)

(d) For PCB Article Container: § 761.180(b)(2)(ii)(D) [1990]

(1) unique number identifying each? (assigned by generator) Yes___No___

(2) description of contents of each? (e.g., pipes, capacitors, electric motors, pumps, etc.) Yes___No___

(3) total weight in kilograms of PCB waste in each PCB Article Container? Yes___No___

(4) first date a PCB Article placed into each for disposal? Yes___No___

(5) total weight of the PCB Articles in kilograms in each PCB Article Container? Yes___No___

(6) date received at the facility? Yes___No___

(7) date each PCB Article Container placed in transport for off-site storage or disposal? Yes___No___N/A___

(8) confirmed date of disposal? Yes___No___

§ 761.180(b)(2)(ii)(E) [1990]

18. Does the facility's written Annual Document Log include the same information as identified in Question 17 for PCB waste generated by the facility and disposed of by the facility? § 761.180(b)(2)(iii) [1990] Yes___No___N/A___

If NO, Explain:_____

_____

_____

19. Does the facilities written Annual Document Log include the same information as identified in question 17 for PCB waste that was not manifested to the facility? § 761.180(b)(2)(iii) [1990] Yes___No___N/A___

If NO, Explain:_____

_____

_____

20. Identify which calendar year Annual Documents or Annual Document Logs were reviewed.

ANNUAL DOCUMENTS

_____ _____ _____ _____ _____ _____ _____

ANNUAL DOCUMENT LOGS

_____ _____ _____ _____ _____ _____ _____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

21. Any deficiencies in recordkeeping must be described below, including information on the amount of PCBs involved.
(copy deficient records or at least a sample quantity. Quantify PCB weights and PCB Items not properly recorded)

Deficiencies? YES___ NO___ N/A___

FACILITY NAME BP Block 31
EPA ID NUMBER TXD 000802918

SUBSECTION D - OIL-FILLED ELECTRICAL EQUIPMENT

1. Does facility have any oil filled electrical equipment that is considered PCB contaminated (50 ppm or greater but less than 500 ppm) either by assumption or by testing?
(NOTE: "Oil Filled" refers to mineral oil; therefore, mineral oil may be assumed to be PCB contaminated [50 to 500 PPM PCBs] in lieu of testing).
Yes___ No_✓_ N/A_✓_

If YES, list status below.

EQUIPMENT	NUMBER REMAINING IN SERVICE AT TIME OF INSPECTION	NUMBER REMOVED FROM SERVICE SINCE 7/02/78	NUMBER IN STORAGE FOR DISPOSAL AT TIME OF INSPECTION	NUMBER SENT FOR DISPOSAL SINCE 7/02/78	NUMBER TESTED THOSE REMAIN SERVCE	TOTAL NUMBER RECLASS IFIED
1. TRANSFORMERS						
2. VOLTAGE REGULATORS						
3. CIRCUIT BREAKERS						
4. SWITCHES						
5. RECLOSERS						
6. CABLE						
7. MOTOR STARTRS						
8. SECTIONALIZRS						
9. ELECTROMAGNTS						

COMMENTS: _____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

SECTION E - USE AND SERVICING (40 CFR PART 761.30)

1. Do any PCB Transformers (in use or stored for reuse) pose an exposure risk to food/feed or food/feed products?
§ 761.30(a)(1)(i) - Prohibited after October 1, 1985 Yes___No___N/A✓

If YES, identify PCB Transformer(s) by serial number, PCB concentration and location:_____

2. Are visual inspections of PCB Transformers conducted: Yes___No___N/A___

(a) Quarterly? § 761.30(a)(1)(ix) Yes___No___

1. If YES, are there at least 30 days between inspections? Yes___No___

2. Date inspections initiated:_____
(Effective date May 11, 1981) [Federal Register/Vol. 46, No. 46/Tuesday, March 10, 1981]

(b) Yearly? § 761.30(a)(1)(xiii) Yes___No___

1. If YES, is there impervious undrained, secondary containment for 100% of the fluid? Yes___No___N/A___
2. Is the concentration less than 60,000 ppm? Yes___No___N/A___
3. If YES, are there at least 180 days between inspections? Yes___No___N/A___
4. Date inspections initiated:_____
(Effective date August 1982) [Federal Register/Vol.47, No. 165/Wednesday, August 25, 1982]

3. Were any PCB Transformers ever found to have a leak? Yes___No___N/A___
§ 761.30(a)(1)(x)

If YES,
(a) Were records maintained? § 761.30(a)(1)(xii) Yes___No___N/A___
(b) Was any active leak of PCBs contained to prevent exposure to humans or the environment? Yes___No___N/A___
(c) Was active leak inspected daily to verify containment? Yes___No___N/A___
(d) Was cleanup of released PCBs initiated within 48 hours? Yes___No___N/A___

If NO, how long until cleanup was initiated? _____
(Give date of leak; date when cleanup was initiated; and date cleanup was accomplished)

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

4. Are records of PCB Transformer Inspection and Maintenance (I & M) history available? § 761.30(a)(1)(xii) Yes___No___N/A___

5. If QUESTION 4 is "YES", Do I & M records indicate the following information for each PCB Transformer: § 761.30(a)(1)(xii)
   (a) Its location? Yes___No___
   (b) Date of each visual inspection? Yes___No___
   (c) Name of person performing the inspections? Yes___No___
   (initials are not sufficient)
   (d) Location of any leak(s)? Yes___No___N/A___
   (e) Date leak(s) was discovered? Yes___No___N/A___
   (f) Date of any cleanup, containment, repair or replacement? Yes___No___N/A___
   (g) Description of cleanup, containment or repair performed? Yes___No___N/A___
   (h) Est. amount dielectric fluid released from any leak? Yes___No___N/A___
   (i) Results of any containment and daily inspections required for uncorrected active leaks? Yes___No___N/A___

6. Any deficiencies in the inspection and maintenance program must be described. Also collect at least a sample of the deficient records.

   Deficiencies? Yes___ No___ N/A___

   _____

   _____

   _____

   _____

   (use additional pages if needed)

7. As of 12/1/85, have PCB Transformers been registered with fire response personnel with primary jurisdiction for responding to a fire at the facility? § 761.30(a)(1)(vi) Yes___No___N/A___

   If YES, did the information include:
   (a) Location of transformers? Yes___No___
   (b) Type of dielectric fluid? Yes___No___
   (c) Name and phone number of person to contact in event of fire involving the equipment? Yes___No___

8. Does facility maintain their own fire brigade? Yes___No___
   § 761.30(a)(1)(vi)

   If YES, Explain:
   (attach photos of fire equipment; number of trained fire personnel; copy of training attended; procedures manual, etc.)

   _____

   _____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000 802 918

9. Was a PCB Transformer installed in or near a commercial building after October 1, 1985? § 761.30(a)(1)(iii)
In or near a Commercial Building means inside, on, or within 30 meters (100 feet) of a nonindustrial, nonsubstation building. Commercial buildings are accessible to the public as well as employees. Examples include schools, hospitals, office buildings, stores, apartment buildings, churches, and transportation terminals and stations. Yes___No___

If YES, Explain and Identify PCB Transformer(s):_____

_____

_____

10. As of December 1, 1985, were PCB Transformers in use in or near commercial buildings registered with the building owners?
(for PCB Transformers located in commercial buildings, owners of the transformers must register them with the building owner of record; and for PCB Transformers located near commercial buildings, owners of the transformers must register them with all owners of buildings located within 30 meters [100 feet] of the PCB Transformer) § 761.30(a)(1)(vii)
YES___No___N/A___

If YES, did the information include:
(a) Specific location? Yes___No___
(b) Type of dielectric fluid? Yes___No___
(c) Type of transformer installation? Yes___No___
(e.g., 208/120 volt network,
280/120 volt radial,
208 volt radial,
480 volt network,
480/277 volt network,
480 volt radial,
480/277 volt radial)

11. As of December 1, 1985, were any combustible materials stored within 5 meters [16 1/2 feet] of a PCB Transformer or PCB Transformer enclosure?
Yes___No___N/A___
§ 761.30(a)(1)(viii)
(NOTE: KEY WORD IS STORED, THAT IS, NOT CURRENTLY BEING USED)
Examples: paints, plastics, paper, wood

If YES, attach documentation and identify length of time; photo required

_____

_____

_____

_____

12. Were any fire related incidents involving a PCB Transformer reported to the National Response Center? (Washington, D.C.) (1-800-424-8802)
§ 761.30(a)(1)(xi)
Yes___No___

If YES, Explain:_____

_____

_____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

13. After December 1, 1985, was the PCB Transformer access door, fence, hallway, etc., properly marked? § 761.40(j)

Yes___No___N/A

If NO, Explain: (photo required) _____

14. Have any PCB Transformers in or near commercial buildings been installed in emergency situations? § 761.30(a)(1)(iii)(A) & (B) and Federal Register July 19, 1988
[Prohibited after 10/1/90 - § 761.30(a)(1)(iii)(B)(2)]

Yes___No___

If YES, Explain: _____

15. Have mineral oil transformers that have been tested and found to be contaminated above 499 ppm met the requirements of § 761.30(a)(1)(xv)?
(Inspection & Maintenance records and recordkeeping in annual document/log required when test analysis shows PCB concentration greater than 500 ppm)

Yes___No___N/A___

If YES, were they:

(a) Marked within 7 days? Yes___No___
(b) Registered with fire department? (within 30 days) Yes___No___
(c) Registered with building owner? (within 30 days) Yes___No___N/A___
(d) Installed electrical protective equipment by 10/1/90 Yes___No___
(e) Retrofilled and reclassified by 10/1/90 Yes___No___
(f) Removed within 18 months of discovery or by 10/1/90 whichever is later? Yes___No___

If "NO" to any of the above Items (a) through (f), Explain: _____

16. As of October 1, 1990, does facility have in service in or near a commercial building network PCB Transformers with higher secondary voltages? (secondary voltages = or > 480 volts, including 480/277 volt systems) § 761.30(a)(1)(ii)

Yes___No___

If YES, Explain and Identify PCB Transformer(s):

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

17. As of October 1, 1990, does facility have in service in or near a commercial building a radial PCB Transformer or lower secondary voltage network PCB Transformers **NOT LOCATED** in sidewalk vaults **THAT HAVE NOT** been equipped with electrical protection to avoid transformer ruptures caused by high current faults? § 761.30(a)(1)(iv)

Yes___No___

If YES, Explain and Identify PCB Transformer(s):_____

_____

_____

_____

18. As of October 1, 1990, does facility have in service in or near a commercial building a radial PCB Transformer with higher secondary voltages 480 volts and above, including 480/277 volt systems) that have not been equipped with electrical protection to avoid transformer ruptures caused by sustained low current faults? § 761.30(a)(1)(v) Yes___No___

If YES, Explain and Identify PCB Transformer(s):_____

_____

_____

_____

_____

19. Does facility have in service in or near a commercial building a lower secondary voltage network PCB Transformer (network transformer with secondary voltage below 480 volts) **NOT LOCATED** in a sidewalk vault which has not been protected with electrical safety device? § 761.30(a)(1)(iv)(B) Yes___No___

If YES, has facility registered in writing this/these PCB Transformer(s) with EPA? (Effective 10/1/90) § 761.30(a)(1)(iv)(C) Yes___No___

20. Have any PCB Items been Retrofilled/Retrofitted and Reclassified? § 761.30(a)(2)(v) Yes___No___

If YES, was documentation maintained? Yes___No___
(Representative sample to be attached)

Explain procedures followed (e.g. 50° C reached, tested after 90 days in service, etc):

_____

_____

_____

(use additional pages if needed)

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

21. Does the facility service PCB Transformers? Yes___ No✓

If YES, do they remove the coil? § 761.30(a)(2)(ii) Yes___ No___

Explain any servicing deficiencies:

(use additional pages if needed)

22. Is any PCB filled electrical equipment serviced at this location? § 761.30(a)(2)(i) Yes___ No___

If YES,
(a) Is it serviced with < 50 ppm PCB dielectric fluid? Yes___ No___

(b) Is it serviced with < 500 ppm PCB dielectric fluid? Yes___ No___

(c) Is it serviced with > 500 ppm PCB dielectric fluid? Yes___ No___

Explain: [Give original concentration(s)]

(use additional pages if needed)

23. Is processing and distribution in commerce of PCBs for purposes of servicing transformers performed? § 761.30(a)(2)(vii) Yes___ No___

If YES, has an exemption been granted? [TSCA 6(e)(3)(B)] Yes___ No___

If YES, is facility listed in 40 CFR Part 761.80-Exemptions? Yes___ No___

Explain circumstances and describe any servicing deficiencies:

(use additional pages if needed)

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000 802 918

24. Were PCB Capacitors being used? § 761.30(1) Yes___ No✓

(a) If YES, were they used within a restricted-access electrical substation or in a contained and restricted access indoor installation? § 761.30(1)(1)(ii) Yes___ No___

(b) If YES, whether in use or in storage after October 1, 1988, do they pose an exposure risk to food or feed? § 761.30(1)(1)(i) Yes___ No___

25. Were PCB Capacitors, **NOT LOCATED IN RESTRICTED-ACCESS AREAS**, replaced or removed from service before October 1, 1988? § 761.30(1)(1)(ii)
Yes___ No___ N/A___

If NO, Explain:_____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

SECTION F - USE IN HEAT TRANSFER AND HYDRAULIC SYSTEMS (40 CFR PART 761.30)

1. Does the facility have any Heat Transfer Systems that ever contained PCBs? § 761.30(d) Yes___No✓

If YES,

(a) Were they tested by November 1, 1979 to determine PCB concentration? § 761.30(d)(1) Yes___No___Unknown___
If NO, when were they tested? _____

(b) Did PCB concentration reach 50 ppm or greater? § 761.30(d) Yes___No___Unknown___

(c) Was the system(s) drained and refilled within six months after testing if it contained PCBs at 50 ppm or greater? § 761.30(d)(2) Yes___No___Unknown___

(d) Was system(s) tested annually thereafter until concentration was less than 50 ppm? (no sooner than three months after refilling) § 761.30(d)(1) Yes___No___N/A___Unknown___

(e) Does facility maintain a record of the test analysis? [Must be kept for five years after system(s) reach 50 ppm] § 761.30(d)(5) Yes___No___N/A___Unknown___

(f) Has facility used a system containing 50 ppm or above after July 1, 1984? § 761.30(d) Yes___No___Unknown___

2. Does the facility have any Hydraulic Systems that ever contained PCBs? § 761.30(e) Yes___No___

If YES,

(a) Were they tested by November 1, 1979 to determine PCB concentration? § 761.30(e)(1) Yes___No___Unknown___
If NO, when were they tested? _____

(b) Did PCB concentration reach 50 ppm or greater? § 761.30(e) Yes___No___Unknown___

(c) Was the system(s) drained and refilled within six months after testing if it contained PCBs at 50 ppm or greater? § 761.30(e)(2) Yes___No___Unknown___

(d) Was system(s) tested annually thereafter until concentration was less than 50 ppm? (no sooner than three months after refilling) § 761.30(e)(1) Yes___No___N/A___Unknown___

(e) Does facility maintain a record of the test analysis? [Must be kept for five years after system(s) reach 50 ppm] § 761.30(e)(5) Yes___No___N/A___Unknown___

(f) Has facility used a system containing 50 ppm or above after July 1, 1984? § 761.30(e) Yes___No___Unknown___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

If PCBs are suspected and tests have not been performed by the facility, collect sample for analysis and describe below:

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

SECTION G - STORAGE AND HANDLING (40 CFR PART 761.65)

NOTE: Use duplicate pages if facility has more than one storage area in same category.

A. STORAGE FOR DISPOSAL GREATER THAN 30 DAYS

1. Has/does facility store(d) PCBs/PCB Items for disposal? Yes___No___N/A✓
   Is the storage area entrance(s) properly marked? Yes___No___N/A___
   § 761.40(a)(10) and § 761.65(c)(3)

   If NO, how many entrance(s) are there? (photo required) _____

   If alternative marking is used, describe and photograph:

   _____

   _____

   _____

2. Are all PCBs in storage for disposal checked for leaks at least every 30 days? § 761.65(c)(5) Yes___No___N/A___

   If YES, are records of inspections maintained? Yes___No___
   If NO, identify the storage area(s) not inspected every 30 days and provide documents of your determination: (e.g. records)

   _____

   _____

   _____

3. Have leaking PCB Articles and Containers and their contents been transferred to non-leaking containers? § 761.65(c)(5) Yes___No___N/A___

   If NO, specify and describe: (photograph required)

   _____

   _____

   _____

   _____

4. If PCB dielectric fluid for servicing equipment is present, is it being stored in compliance with the storage for disposal provisions? (e.g. marked, TSCA storage area, records maintained, etc) § 761.30(a)(2)(vi) Yes___No___N/A___

   If NO, NOTE quantity and storage deficiencies: (photo required)

   _____

   _____

   _____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

5. Are all PCB Articles and PCB Containers dated when placed in storage? Yes___No___N/A___
§ 761.65(c)(8)
If NO, identify and explain: (photo required)

6. Are all PCB Items arranged so they can be located by date? Yes___No___N/A___
§ 761.65(c)(8)

7. If nonliquid PCBs are stored in container(s) larger than specified DOT containers, do they provide the same strength and protection? Yes___No___N/A___
§ 761.65(c)(6)
Describe: (photo required)

8. Is recorded inventory of PCBs in storage equal to what is in storage? Yes___No___N/A___

If NO, Explain:

9. Has storage/disposal facility stored PCBs in excess of one year? Yes___No___N/A___
§ 761.65(a)

If YES, Identify the PCBs and PCB Items stored in excess of one year.
(description, serial number, quantity, etc., photograph required)

If YES, was final disposal/destruction accomplished within one year? Yes___No___N/A___

If NO, were PCBs/PCB Items stored:

(a) in excess of nine months by using facility? Yes___No___N/A___
(b) for at least one year by using facility? Yes___No___N/A___
(c) in excess of three months by disposal facility? Yes___No___N/A___

Explain:

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

10. Does the storage area meet the following criteria: § 761.65(b)(1)(i) through (iv)

(a) Adequate roof? Yes___ No___ N/A___

§ 761.65(b)(1)(i)
(b) Adequate walls? Yes___ No___ N/A___

§ 761.65(b)(1)(i)
(c) Impervious floor? Yes___ No___ N/A___

§ 761.65(b)(1)(iv)
(d) Minimum six inch continuous curb? Yes___ No___ N/A___

§ 761.65(b)(1)(ii)
(e) Containment volume? Yes___ No___ N/A___

§ 761.65(b)(1)(ii)
(1) What is containment volume?_____

(2) What is the internal volume of the largest stored PCB Articles or PCB Containers stored for disposal?_____

(3) What is the total internal volume of all PCB Articles and Containers stored for disposal?_____

(4) If applicable, what is the total internal volume of PCB Items stored for future use?_____

(5) Is the containment volume of the storage facility at least equal to twice the internal volume of the largest stored PCB Article or PCB Container? Yes___ No___ N/A___

(6) Is the containment volume of the storage facility at least equal to 25% of the internal volume of all PCB Articles or PCB Containers being stored? Yes___ No___ N/A___

(f) Is the area within the curbed area void of drains, valves, expansion joints, or other openings? Yes___ No___ N/A___

§ 761.65(b)(1)(iii)
If NO, describe type, location and size of opening:_____

_____

_____

(g) Is storage site above the 100 year floodplain? Yes___ No___

§ 761.65(b)(1)(v)

(h) Any deficiencies in long-term storage facility(s) must be documented with photographs and described below:

(Include amount of PCBs involved)

Deficiencies? Yes___ No___ N/A___

_____

_____

_____

_____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

B. TEMPORARY STORAGE (30 DAYS AND LESS)

1. Are any PCB Items being stored in an area NOT meeting the requirements of a temporary storage area? § 761.65(c)(1) Yes___No___

   If YES, Explain: (photograph and identify PCBs and PCB Items to include quantity)

2. Does Facility store PCBs and PCB Items in an area meeting the requirements of a temporary storage area? § 761.65(c)(1) Yes___No___

3. If QUESTION 2 is answered YES, is this temporary storage area properly marked? § 761.40(a)(10) & § 761.65(c)(3) Yes___No___

   If temporary storage area is not marked, Explain: (photo required)

4. Are non-leaking and structurally undamaged PCB Large High Voltage Capacitors and PCB-Contaminated Electrical Equipment that have not been drained of free flowing dielectric fluid being stored on pallets next to a storage facility that meets the requirements of 761.65(b)? § 761.65(c)(2) Yes___No___

5. If QUESTION 4 is answered YES, does the storage facility have immediately available unfilled storage space which is equal to 10% of the total volume of capacitors, equipment and containers being temporarily stored? § 761.65(c)(2) Yes___No___

6. If Question 2 is answered YES, are the PCBs and PCB Items in temporary storage checked weekly for leaks? § 761.65(c)(2) Yes___No___

   If NO, Explain how this determination was made:

(use additional pages if needed)

7. If Question 2 is answered Yes, do all PCB Items in temporary storage bear the date when removed from service? § 761.65(c)(1) Yes___No___

   If NO, Explain: (photograph and identify)

(use additional pages if needed)

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

8. If Question 2 is answered Yes, have all PCB Items in temporary storage been stored less than 30 days? § 761.65(c)(1) Yes___No___

If NO, Explain: (photograph and identify)

9. Are any PCB Containers with fluid at concentrations of 500 ppm or greater in temporary storage? § 761.65(c)(1)(iv) Yes___No___

If YES, Photograph and Identify:

10. If QUESTION 2 is answered YES, are containers of liquid PCBs marked to indicate that concentrations do not exceed 500 ppm PCB? § 761.65(c)(1)(iv) Yes___No___

If NO, photograph, provide location and any identifying information marked on the container.

11. If facility stores in a temporary storage area PCB Containers containing liquid PCBs does facility have a Spill Prevention, Control and Countermeasure (SPCC) Plan prepared for the temporary storage area in accordance with 40 C.F.R. Part 112? § 761.65(c)(1)(iv) Yes___No___N/A___

12. If QUESTION 11 is answered YES, is SPCC Plan been certified to by a Registered Professional Engineer? 40 C.F.R. Part 112.3(d) Yes___No___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

C. LIQUID BULK STORAGE

1. Are any liquid PCBs (50 ppm or greater concentration) being stored in containers larger than a specified DOT container? § 761.65(c)(7) Yes___No___

   Describe containers:_____

2. If QUESTION 1 is answered Yes, has facility prepared and implemented an SPCC plan pertaining to bulk storage? § 761.65(c)(7)(ii) Yes___No___

   If YES, has SPCC plan been certified to by a Registered Professional Engineer? 40 C.F.R. Part 112.3(d) Yes___No___

4. Are bulk tanks containing liquid PCBs marked with the PCB label? § 761.40(a)(1) Yes___No___N/A___

   If NO, Identify: (photo required)

   If applicable, describe and photograph alternative marking:_____

5. Does the facility have records of each batch, quantity and date for PCBs added to bulk tanks? (attach sample) § 761.65(c)(8) Yes___No___N/A___

6. Does the facility have records of each batch, quantity and date for PCBs removed from bulk tanks? (attach sample) § 761.65(c)(8) Yes___No___N/A___

7. Do records of each batch, quantity and date of PCBs added to and removed from tanks indicate storage of PCBs in excess of one year? § 761.65(a) Yes___No___N/A___

   If YES, Explain:_____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

SECTION H - BURNING/MARKETING/DISPOSAL OF PCB OIL 40 CFR PART 761.20(e)

1. Does the facility burn oil with a PCB concentration greater than 2 ppm as a fuel? § 761.20(e) Yes___No✓

   (a) If YES, does the facility have an approved industrial furnace or boiler as defined in 40 CFR Part 260.10? § 761.20(e)(3) Yes___No___

   (Examples of industrial furnace or boiler are cement kiln; lime kiln; aggregate kiln; phosphate kiln; coke oven; blast furnaces; smelting, melting and refining furnaces; titanium dioxide chloride process oxidation reactors; methane reforming furances; pulping liquor recovery furances; combustion devices used in recovery of sulfur values from spent sulfuric acid and others)

   (b) If YES, has the facility sent the required notification to EPA? 40 C.F.R. Part 266.44(e) & § 761.20(e)(3)(ii)(A) (attach copy of notification) Yes___No___

   (c) If YES, does the facility burn oil with a PCB concentration greater than 49 ppm? § 761.20(e)(2)(ii) & § 761.60(a) Yes___No___

   If YES, Explain:_____

   _____

   _____

   (use additional sheets if needed)

2. Does the facility market used oil with a PCB concentration greater than 2 ppm? § 761.20(e)(1) Yes___No___

   (a) If YES, does the facility market this oil as a fuel to burners? § 761.20(e)(1)(iii) Yes___No___

   (1) If YES, has the burner(s) provided the facility with the required notification? § 266.44(e) & § 761.20(e)(3)(ii) Yes___No___

   (2) If YES, has the burner(s) sent the required notification to EPA? § 266.44(e) (attach copy of notification) Yes___No___

   (b) If YES, does the facility market this oil to other marketers? § 761.20(e)(1)(ii) Yes___No___

   (1) If YES, has the other marketer(s) sent the required notification to EPA? § 266.43(b)(6)(i) & (b)(6)(ii) & § 761.20(e)(4)(i) (attach copy of notification) Yes___No___

3. Does the facility receive used oil with a PCB concentration greater than 2 ppm as a fuel from a marketer? § 761.20(e)(3)(ii) Yes___No___

   If YES, does the facility have a copy of each Certification Notice sent to marketer(s)? § 266.44(e) & § 761.20(e)(3)(ii) & § 761.20(e)(4)(ii) Yes___No___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

4. Does the facility have a copy of analysis or other information documenting that the used oil contains no detectable concentrations of PCBs? § 761.20(e)(2)(i) & (iii) & § 761.20(e)(4)(i) (attach copies)
Yes___No___N/A___

5. Does the facility have a copy of each certification notice received or prepared relating to transactions involving used oil containing PCBs? § 761.20(e)(4)(i) & (ii) (attach copies) Yes___No___N/A___

6. Has the facility properly disposed of all PCBs or PCB Items according to 40 CFR Section 761.60? Yes___No___N/A___
(§ 761.60 states that PCBs at concentrations of 50 ppm or greater must be disposed of in an incinerator, chemical waste landfill, high efficiency boiler, or an alternative to incineration approved by EPA)

If NO, Explain and Identify:_____

PROHIBITION - § 761.20(d)

1. Does facility use waste oil that contains any detectable concentration of PCB as a sealant, coating, or dust control agent? Yes___ No___
[Prohibited uses include, but are not limited to, road oiling, general dust control, use as a pesticide or herbicide carrier, and use as a rust preventative on pipes]

If YES, Explan:_____

(use additional pages if needed)

FACILITY NAME BP Block 31
EPA ID NUMBER TXD000802918

SECTION I - MANUFACTURING, PROCESSING, & DISTRIBUTION IN COMMERCE EXEMPTIONS 40 CFR PART 761.80

1. Does the facility have an Exemption? Yes___No✓___

   If YES, is facility listed in 40 CFR Part 761? Yes___No___

   If NO, Explain:

FACILITY NAME BP Block 31
EPA ID NUMBER TXD000802918

SECTION J - DECONTAMINATION 40 CFR PART 761.79

1. Does the facility drain or cleanse PCB Transformers or other electrical equipment containing PCB substances prior to disposal?
§ 761.60(b)(1)(i)(B) & § 761.60(b)(4) & § 761.60(b)(5)

Yes___No_/_

If YES, Explain:_____

_____

_____

2. Does the facility decontaminate movable equipment? Yes___No___
§ 761.79(b) & § 761.65(c)(4)

If YES, Explain:_____

_____

_____

_____

_____

3. Does the facility decontaminate PCB Containers? § 761.79(a) Yes___No___

4. Is the drainage and solvent filling site adequate to protect against spills and leaks as well as subsequent contamination of surrounding areas and waterways? Yes___No___N/A___

If NO, Explain:_____

_____

_____

_____

5. Do solvents to be used for removing PCBs contain less than 50 ppm PCBs? Yes___No__N/A___
§ 761.79(a)

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

6. Was a sample of the solvent which was used for PCB decontamination obtained?

Yes___No___N/A___

If NO, Explain:_____

_____

_____

7. Was the rinse volume of the diluent approximately equal to 10% of the PCB Container capacity? § 761.79(a) Yes___No___N/A___

8. Were the PCB Containers rinsed three times? § 761.79(a) Yes___No___N/A___

9. Were PCB Transformers completely filled with solvent and allowed to stand for at least 18 hours before being drained? § 761.60(b)(1)(i)(B)

Yes___No___N/A___

If NO, Explain:_____

_____

_____

10. Were the PCB chemical substances or PCB solvent mixtures properly stored? § 761.60(a)(6)

Yes___No___N/A___

If NO, Explain: (photo required)

_____

_____

11. Were solvents or materials which have been used for decontamination of PCB equipment disposed of or stored in the same manner as PCB mixtures? § 761.60(a)(6) & § 761.79(a)

Yes___No___N/A___

If NO, Explain:_____

_____

_____

12. If decontamination procedures were not observed during the inspection did facility representative demonstrate knowledge of proper decontamination procedures?

Yes___No___N/A___

If YES, Explain:_____

13. Did facility have written decontamination procedures? Yes___No___N/A___
(attach copy)

14. Describe any deficiencies in the decontamination procedures:

Deficiencies? Yes___ No___ N/A___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

SECTION K - EQUIPMENT IDENTIFICATION AND INFORMATION

(Complete as appropriate when violations may be present)

ITEM	MANUFACTURER	SERIAL NUMBER	TRADE NAME OR CONCENTRATION	QUANTITY	LOCATION	VIOLATIONS
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						

Violation code: M-Marking; S-Storage; R-Recordkeeping; U-Use; D-Disposal; O-Other.
describe how each item number was determined to contain PCBs or may be determined, e.g., nameplate examination, records, analytical reports, pending analysis, etc. If PCB presence is determined by reports or records, copies must be attached.

1. _____

2. _____

3. _____

4. _____

5. _____

6. _____

7. _____

8. _____

9. _____

10. _____

NOTES: _____

_____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

SECTION L - NOTIFICATION AND MANIFESTING OF PCB WASTE ACTIVITIES 40 CFR Part 761.202 through 761.218

I. GENERATOR

1. Is this facility a "Generator of PCB waste" who has engaged in PCB waste handling activities after February 5, 1990? Yes ✓ No ___

   If YES, did facility notify EPA by filing EPA Form 7710-53 and obtain an EPA Identification Number? § 761.205(a)(2) Yes ___ No ___

   If YES, give ID Number TXD000802918

2. Does this generator meet requirements for an exemption? Yes ___ No ✓
   § 761.205(c)(1) and (2)

   If YES, Explain: _____

3. Are all shipments of PCB waste accompanied by a manifest? Yes ___ No ___
   § 761.207(a)

   If NO, Explain: _____

FACILITY NAME BP, BLOCK 31
EPA ID NUMBER TXD000802918

4. Does all the following information appear on the manifest?

§ 761.207 and 761.208

(a) Manifest document number Yes___No___

(b) Generator's name, address, telephone number, EPA ID Number Yes___No___

(c) Generator's signature Yes___No___

(d) Transporter's name and EPA ID Number Yes___No___

(e) Transporter's signature and date Yes___No___

(f) Secondary transporter information Yes___No___N/A___

(g) Disposal facility name, address, telephone number, EPA ID number Yes___No___

(h) Alternate facility information Yes___No___N/A___

(i) Disposal facility signature and date Yes___No___

(j) D.O.T. description of waste Yes___No___

(k) For each PCB Article Container or PCB Container
(1) the unique identifying number Yes___No___

(2) type of PCB waste (e.g., soil, debris, small capacitors, etc.) Yes___No___

(3) earliest date of removal from service for disposal Yes___No___

(4) weight in kilograms of the PCB waste contained Yes___No___

(l) For each bulk load of PCBs
(1) the identity of the PCB waste Yes___No___

(2) earliest date of removal from service for disposal Yes___No___

(3) weight in kilograms of the PCB waste Yes___No___

(m) For each PCB Article not in a PCB Container or PCB Article Container
(1) the serial number if available, or other identification if there is no serial number Yes___No___

(2) date of removal from service for disposal Yes___No___

(3) weight in kilograms of the PCB waste in each PCB Article Yes___No___

(n) Does the following certification appear on the manifest? "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations" Yes___No___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

5. Identify number of manifests inspected and give narrative explanation of deficiencies. (attach copies)

Deficiencies? Yes___ No___ N/A___

6. If Generator has shipped PCB waste out of the United States, is the date of exit and the name and address of receiving facility indicated on manifest?

Yes___No___N/A___

If NO, Explain:

7. If copy of manifest from disposal facility was not returned within 45 days, did the generator/facility file an exception report? (If YES, attach copy) § 761.215(b)

Yes___No___

8. Did facility transfer PCBs or PCB Items to the disposer of PCB waste on a date more than 9 months from the date of removal from service for disposal? § 761.215(d)(1)

Yes___No___

If YES, did facility file One-year Exception Report with EPA?

Yes___No___

9. Did facility not receive a Certificate of Disposal within 13 months from the date of removal from service for disposal or did facility receive a Certificate of Disposal confirming disposal of PCBs or PCB Items on a date more than 1 year after the date of removal from service? § 761.215(d)(2)

Yes___No___

If YES, did facility file a One-year Exception Report with EPA?

Yes___No___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

II. TRANSPORTER

1. Is this facility a transporter who has engaged in PCB waste handling activities after February 5, 1990?

   Yes___No✓

   If YES, did facility notify EPA by filing EPA Form 7710-53 and obtain an EPA Identification Number? § 761.205(a)(1) Yes___No___

   If YES, give ID Number:_____

2. Are all shipments of PCB waste accompanied by a manifest? § 761.207(a) Yes___No___

   If NO, Explain:_____

   _____

   _____

3. Does more than one location use this identification number? Yes___No___

   If YES, how many?_____

   Identify:_____

4. Identify the mode(s) of transportation used by transporter:

   ___Air ___Rail ___Highway ___Water ___Other (Specify) _____

5. Does transporter ship PCB waste into or out of the U.S.?

   Yes___No___

6. Does transporter mix PCB waste and other hazardous waste of different D.O.T. shipping descriptions by placing them into a single container?

   Yes___No___

   If YES, Explain:_____

   _____

   _____

7. Does the transporter store manifested shipments of PCB waste in containers meeting DOT specifications at a transfer facility?

   Yes___No___

   If YES, Identify transfer facility_____

   _____

   _____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

8. Is all manifested PCB waste that is temporarily stored by the transporter, shipped off-site within 10 days or less? Yes___No___
[761.3 - Definition of "Transfer facility"]

If NO, Explain:_____

_____

9. Does all the following information appear on the manifest?
§ 761.207 & § 761.208

(a) Manifest document number Yes___No___

(b) Generator's name, address, telephone number, EPA ID Number Yes___No___

(c) Generator's signature Yes___No___

(d) Transporter's name and EPA ID Number Yes___No___

(e) Transporter's signature and date Yes___No___

(f) Secondary transporter information Yes___No___N/A___

(g) Disposal facility name, address, telephone number, EPA ID Number Yes___No___

(h) Alternate facility information Yes___No___N/A___

(i) Disposal facility signature and date Yes___No___

(j) D.O.T. description of waste Yes___No___

(k) For each PCB Article Container or PCB Container
(1) the unique identifying number Yes___No___
(2) type of PCB waste Yes___No___
(e.g., soil, debris, small capacitors, etc.)
(3) earliest date of removal from service for disposal Yes___No___
(4) weight in kilograms of the PCB waste contained Yes___No___

(l) For each bulk load of PCBs
(1) the identity of the PCB waste Yes___No___
(2) earliest date of removal from service for disposal Yes___No___
(3) weight in kilograms of the PCB waste Yes___No___

(m) For each PCB Article not in a PCB Container or PCB Article Container
(1) the serial number if available, or other identification if there is no serial number Yes___No___
(2) date of removal from service for disposal Yes___No___
(3) weight in kilograms of the PCB waste in each PCB Article Yes___No___

(n) Does the following certification appear on the manifest?
"I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations" Yes___No___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

10. Identify number of manifests inspected and give narrative explanation of deficiencies. (attach copies)

Deficiencies? Yes___ No___ N/A___

_____

_____

_____

_____

11. If transporter has shipped PCB waste out of the United States, is the date of exit and the name and address of receiving facility indicated on manifest?

Yes___No___N/A___

If NO, Explain:_____

_____

_____

12. Special Conditions:

(a) Does transportation occur by water (bulk shipments)? Yes___No___

If YES, does the transporter:
(1) ship to the designated facility? Yes___No___
(2) maintain shipping papers with information contained on manifest? Yes___No___
(3) obtain designated facility signature and date of receipt? Yes___No___
(4) retain copies of shipping papers for 3 years? Yes___No___

(b) Does transportation occur by rail? Yes___No___

If YES, does the transporter:
(1) sign and date manifest acknowledging acceptance? Yes___No___
(2) return signed copy to nonrail transporter? Yes___No___
(3) forward at least three copies of the manifest to the next appropriate destination? Yes___No___
(4) retain one copy of manifest and rail shipping papers Yes___No___
(5) assure shipping papers accompany the waste(s)? Yes___No___
(6) on delivery, obtain names, date, and signature of designated facility or transporter? Yes___No___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

13. Does transporter keep copies of manifests and shipping papers for the required three year period? Yes___No___

If NO, Explain:_____

14. Does the transporter ship all waste to either the designated facility listed on the manifest or the alternate facility (when applicable) or the next designated transporter?

Yes___No___

If NO, Explain:_____

15. Does the transporter assure delivery to the designated facility outside the United States? Yes___No___

16. What procedures does the transporter follow when delivery of PCB waste to designated facility is prevented? (Narrative explanation)

17. Has transporter ever been involved in a discharge of PCB wastes? (one pound or more of PCBs) Yes___No___

(a) If YES, was the following offices notified?
National Response Center (800/424-8802 or 202/426-2675) Yes___No___
U.S. Coast Guard Yes___No___
State Yes___No___
Principal office of transporter notified? Yes___No___
Local Emergency Planning Committee (LPEC) Yes___No___

(b) Was a written report submitted to the U.S. D.O.T. within 10 days following the discharge? Yes___No___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

18. **Transport Vehicle Inspection** -

Complete this section for vehicles entering or leaving the area with shipments of PCB wastes.

(a) Company/Name/Designation of Vehicle: _____

_____

_____

(b) Truck Driver's Name: _____

(c) What PCB wastes are listed on manifest? (narrative explanation)

_____

_____

_____

(d) Form of containerization of PCB wastes:

_____drums (#) _____size _____kilograms (ea)

_____portable tanks (#) _____volume (ea)

_____gondolas (#)

_____tankers (#) _____type _____volume

(e) Narrative explanation of condition of containerization.
(leaking, corroded, damaged, improperly sealed, poor condition, improper lining, etc.)

_____

_____

_____

(f) Is truck properly placarded and marked? § 761.40(b) Yes___No___

(g) Did generator have to repackage wastes by truck driver's request?

Yes___No___

(h) Is truck driver aware of any special handling of materials?

Yes___No___

(i) Does truck driver have accessible the National Response Center Phone number? Yes___No___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

SECTION APPLIES TO THIS FACILITY YES_____ NO_____

III. COMMERCIAL STORER OR DISPOSER

1. Is this facility a Commercial Storer or Disposer who has engaged in PCB waste handling activities after February 5, 1990? § 761.65(d)
Yes___No___

If YES, did facility notify EPA by filing EPA Form 7710-53 and obtain an EPA Identification Number? § 761.205(a)(1)
Yes___No___

If YES, give ID Number:_____

2. Has this facility submitted an application for a storage approval? § 761.65(d)(1)
Yes___No___

If YES, has facility received storage approval from EPA? § 761.65(d)(2)
Yes___No___

3. Key Employees (Owner/Operator) § 761.65(d)(2)(i)

_____

_____

4. Principals (President, etc.) § 761.65(d)(2)(i)

_____

_____

5. Number of employees (actual or estimate):_____

6. Types of Training (if known):_____

_____

_____

7. Storage Facility: (Est.)_____Ft. Long & _____Ft. Wide

8. Floor Drains: Yes___No___ #_____

Expansion Joints: Yes___No___ #_____

9. 100 year flood plain: Above___Below___

Estimate Ft. Above/Below_____

10. Type and Numbers of PCB Items currently stored (actual or estimated):

Transformers_____ Drums (Liquid)_____

Capacitors_____ Drums (Non-Liquid)_____

Other_____

11. Location: Rural___ or Urban___

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD 000802918

12. Population Density: Residential___Industrial___Commercial___

13. (a) Surface Water: Adjacent to property? Yes___No___

Type?_____Drinking Water? Yes___No___
(e.g., stream, river, lake, other)

Estimated distance from property?_____

(b) Ground Water: Under property? Yes___No___Unk___
Adjacent to property? Yes___No___Unk___

Type?_____
(e.g., water well in aquifer, artisan springs, spring fed ponds....)

Estimated depth:_____ Drinking Water? Yes___No___

14. Agricultural Crops within 1 mile? Yes___No___

15. Livestock or grazing land within 1 mile? Yes___No___

16. Are all shipments of PCB waste accompanied by a manifest? Yes___No___

If NO, Explain:_____

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

17. Does all the following information appear on the manifest?

§ 761.207 and § 761.208

(a) Manifest document number — Yes___No___

(b) Generator's name, address, telephone number, EPA ID Number — Yes___No___

(c) Generator's signature — Yes___No___

(d) Transporter's name and EPA ID Number — Yes___No___

(e) Transporter's signature and date — Yes___No___

(f) Secondary transporter information — Yes___No___N/A___

(g) Disposal facility name, address, telephone number, EPA ID Number — Yes___No___

(h) Alternate facility information — Yes___No___N/A___

(i) Disposal facility signature and date — Yes___No___

(j) D.O.T. description of waste — Yes___No___

(k) For each PCB Article Container or PCB Container
- (1) the unique identifying number — Yes___No___
- (2) type of PCB waste (e.g., soil, debris, small capacitors, etc.) — Yes___No___
- (3) earliest date of removal from service for disposal — Yes___No___
- (4) weight in kilograms of the PCB waste contained — Yes___No___

(l) For each bulk load of PCBs
- (1) the identity of the PCB waste — Yes___No___
- (2) earliest date of removal from service for disposal — Yes___No___
- (3) weight in kilograms of the PCB waste — Yes___No___

(m) For each PCB Article not in a PCB Container or PCB Article Container
- (1) the serial number if available, or other identification if there is no serial number — Yes___No___
- (2) date of removal from service for disposal — Yes___No___
- (3) weight in kilograms of the PCB waste in each PCB Article — Yes___No___

(n) Does the following certification appear on the manifest?

"I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations."

FACILITY NAME BP, Block 31
EPA ID NUMBER TXD000802918

Yes___No___

18. Identify number of manifests inspected and give narrative explanation of deficiencies. (attach copies)

_____

_____

_____

19. Has the facility submitted a "One-Year Exception Report" to EPA when required? § 761.215(c) or (d)

(One-Year Exception Report required if:
1) disposal facility receives PCBs or PCB Items on a date more than 9 months from the date when removed from service for disposal;
2) commercial storer transferred the PCB waste to the disposer of PCB waste on a date more than 9 months from the date of removal from service for disposal;
3) commercial disposer did not receive, within 13 months from the date of removal from service for disposal, a Certificate of Disposal;
4) Certificate of Disposal received confirming disposal of PCB waste on a date more than 1 year after the date of removal from service.

Yes___No___N/A___

If NO, Explain:_____

_____

_____

20. Has the facility submitted an "Unmanifested Waste Report" to EPA when required? § 761.211(c)

Yes___No___N/A___

If NO, Explain:_____

_____

_____

21. Has the facility submitted to EPA a letter describing any manifest discrepancies when required? § 761.210(b) (including: differences between quantities or type of PCB waste designated and type and quantity of PCB waste actually delivered and received)

Yes___No___N/A___

If NO, Explain:_____

_____

_____

22. Does the facility send to the generator a Certificate of Disposal within 30 days of when the disposal of PCB waste was completed? § 761.218

Yes___No___

United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Approval Expires 07-31-96

1. Investigation Identification			2. Time	3. Firm Name
Date	Inspector No.	Daily Seq. No.		
3-2002	TX-070	01	9:27	British Petroleum, Block 31 Plant

4. Inspector Address	5. Firm Address
Texas Department of Health 1100 West 49th Street	1501 FM 1601 Crane, Texas 79731-6512

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

[X] For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

[ ] In addition, this inspection extends to *(Check appropriate blocks):*

- [ ] A. Financial data
- [ ] B. Sales data
- [ ] C. Pricing data
- [ ] D. Personnel data
- [ ] E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

40 CFR Part 761 - PCBs

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature		Recipient Signature	
Name: Gordon Leeks		Name: Gerald Rivera	
Title: Inspector	Date Signed: 3-20-02	Title: Mach1 Supervisor	Date Signed: 3-20-02

*U.S. GPO: 1994-300-835/00257

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION		
DATE: 3-20-02	INSPECTOR NO.: TX-070	DAILY SEQ. NO.: 01

2. FIRM NAME: British Petroleum, Block 31 Plant

3. INSPECTOR NAME: Gordon Leeks

4. FIRM ADDRESS: 1501 FM 1601, Crane, Texas 79731-6512

RECEIVE
JUL 25 2002
Air/Toxics & Inspection Coordination Branch 6EN-A

5. INSPECTOR ADDRESS:
Texas Department of Health
1100 West 49th Street
Austin, Texas 78756

6. CHIEF EXECUTIVE OFFICER NAME: Lord John Brown

7. TITLE: CEO

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

Ms. Lou Roberts
U.S. Environmental Protection Agency (6T-PT)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice

SIGNATURE: [signature]

NAME: Gerald Rivera

TITLE: Maint. Supervisor

DATE SIGNED: 3-20-02

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

NAME:

TITLE:

ADDRESS:

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT
INVESTIGATION SUMMARY

11. Facility Name		
British Petroleum, Block 31 Plant		

1. INVESTIGATION IDENTIFICATION			2. Region/State
Date: 3-20-02	Inspector Number: TX-070	Daily Sequence: 01	06/TX

12. Street
1501 FM 1601

3. Inspecting Org.	4. Contract Number	5. Contract Work Order
C ☐ E ☐ S ☒		

6. Facility Function	7. Invest. Type	8. Reason for Investigation	13. City	14. State	15. ZIP Code
US	6PS	NSS	Crane	Texas	79731-6512

9. Referral Agency	10. Warrant Required	16. DUNS Number	17. SIC Codes
	Yes ☐ No ☒		NAICS 211111

SAMPLE INFORMATION

18. Sample Sequence Number	19. State Sample Number	18. Sample Sequence Number	19. State Sample Number
20. CAS Number	21. Project Code	20. CAS Number	21. Project Code
22. Sample Medium	23. Date Collected	22. Sample Medium	23. Date Collected
24. Lot or Other Codes	25. Date Shipped	24. Lot or Other Codes	25. Date Shipped
26. Sample Identification		26. Sample Identification	
27. Amount Before Sampling		27. Amount Before Sampling	
28. Sample Description		28. Sample Description	

OTHER FACILITIES

29. Manufacturer/Processor *(Other than above)*			29. Manufacturer/Processor *(Other than above)*		
30. City	31. State	32. ZIP Code	30. City	31. State	32. ZIP Code
33. DUNS Number			33. DUNS Number		

RECORDS

34. Original Records		34. Original Records	
6T-PT			
35. Sample Delivered To	36. Date	35. Sample Delivered To	36. Date
37. Remarks		37. Remarks	

INSPECTION DOCUMENTS

38. Credentials Presented	39. Notice of Inspection	40. Notice of Confidentiality	41. Chain of Custody	42. Receipt for Samples/ Documents	43. Declaration of Confidentiality
☑	☑	☑	☐	☐	☐

44. Inspector's Name	45. Inspector's Signature
Gordon Leeks	D Gordon Leeks

EPA Form 7740-5 (3-83)

INSPECTION FILE

British Petroleum, Block 31 Plant

1501 FM 1601

Crane, Texas 79731-6512

Date: March 20, 2002

Time: 10:39 a.m.

Photographer: Gordon Leeks

Camera: Sony Mavica FD88

Data Location: TDH

Photo # 1 of 2

Remediation site where air compressor and dehydrator were located prior to 1981 facing southeast. The remediation site is within the confines of the yellow rope.

British Petroleum, Block 31 Plant

1501 FM 1601

Crane, Texas 79731-6512

Date: March 20, 2002

Time: 10:44 a.m.

Photographer: Gordon Leeks

Camera: Sony Mavica FD88

Data Location: TDH

Photo # 2 of 2

Remediation site where air compressor and dehydrator were located prior to 1981 facing northwest. The remediation site is within the confines of the white rope.

3-20-02

Block 31 plant

PCB oil was used in the lubrication system for air compressors prior to 1981 according to Mike Harris. During 2000 began checking soil in areas that could have been contaminated by the lubrication system

Disposed of at WCS, Andrews

How did store boxes?
removed boxes w/ in 5 days of filling roll off which took ca 2 days

Photo #1 remediation site air compressor & dehydrator site Facing Southeast

Photo #2 Facing Northwest

Marquet Lowe EH&S Midland
(915) 556-5322